REPORT ON INSPECTION TO DETERMINE COMPLIANCE WITH THE EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT OF 1986 (EPCRA), SECTIONS 302, 304, 311, AND 312

E.B. EDDY PAPER COMPANY PORT HURON, MICHIGAN

TDD: S05-9603-025 PAN: 6M2501SIXX

DECEMBER 18, 1997

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF CHEMICAL EMERGENCY PREPAREDNESS AND PREVENTION
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604



ecology and environment, inc.

International Specialists in the Environment

33 North Dearborn Street, Chicago, Illinois 60602 Tel. 312/578-9243, Fax: 312/578-9345

I Introduction

Ecology and Environment, Inc. (E & E), which is a Superfund Technical Assessment and Response Team (START) contractor to United States Environmental Protection Agency (U.S. EPA) Region V, was tasked under technical Direction Document number S05-9603-025 to conduct inspections of pulp and paper mills.

Company Identification

Facility Name:

E.B. Eddy Paper Company

1700 Washington Street, Port Huron, MI 48060

Responsible official:

Ms. Christine Lupu

Title:

Manager, Environmental Engineer

II <u>Date of Inspection</u>

1. Initial Contact by Telephone:

August 13,1996

2. Inspection Announcement Letter:

August 19, 1996

3. Inspection Date:

August 30, 1996

III Participants

Christine J. Lupu

Environmental Engineer

E.B. Eddy Paper Company

Stephen J. Bently

Technical Director

E.B. Eddy Paper Company

Dick Wagner

Resident Manager

E.B. Eddy Paper Company

Randy McNealy

Utilities Superintendent

E.B. Eddy Paper Company

Raghavender Nagam

Inspector, Ecology and Environment, Inc.

Superfund Technical Assessment and Response Team (START)

contractor

IV Objectives

The inspection was conducted to document the facility's reporting practices and to determine its' compliance with CERCLA 103 and EPCRA regulations, Sections 302, 304, 311, and 312

V <u>Background</u>

E.B. Eddy Paper (E.B. Eddy) Company is a paper manufacturing facility that has been in operation since 1888. The facility purchases processed pulp and utilizes 4 paper machines to

produce approximately 350 tons/day of paper. The facility employs about 300 full-time employees and is a subsidiary of E.B. Eddy Forest Products, Ottawa, Ontario, Canada.

The E.B. Eddy Company uses 4 paper machines to produce paper of different varieties. Paper machine #6, #7, and #9 are old machines while paper machine #8 was rebuilt in 1989 to increase its capacity. The facility installed a gas fired hood on paper machine #8, and was required by the State to conduct volatile organic compound (VOC) monitoring.

The facility employs one coal boiler and two natural gas boilers to generate steam. The coal boiler (Boiler #2) is also used to generate electricity (70%) that is sold commercially. The coal boiler was built in 1966, and was owned and operated by Detroit Edison Co, Detroit, Michigan, E.B. Eddy Company purchased it form Detroit Edison. The air permit requirements for this 150,000 pounds (lbs) of steam per hour (hr) pulverized coal firing boiler (69 million British thermal unit [MMBTU/hr]) include particulate emission rate not to exceed 0.28 lbs per 1,000 lbs of exhaust gases, corrected to 50 percent (%) excess air, visible emissions are limited to an opacity of less than or equal to 20%, and sulfur dioxide emissions not to exceed 2.4 lbs/MMBTU of heat input, which is equivalent to using coal with a 2% sulfur content and a heat value of 12,000 BTU's per lb. The exhaust from the coal boiler is passed through the stack and electrostatic precipitator (ESP), and opacity is monitored by continuous emission measurement system (CEMS) equipment. The facility collects sample every day, and analyses a composite sample every week. The gas Boiler #4, constructed in 1937, is rated at 91 MMBTU/hour and the gas Boiler #5, constructed in 1968, is rated at 196 MMBTU/hour. Both these gas boilers are used as backup units. The facility indicated that they are not required by the State to do any monitoring of the exhaust from these gas boilers. The facility monitors VOC emissions from paper machine #8, as required by the State Permit #690-88, and has a emission limit of 26.2 tons of VOCs per year. The facility uses the VOC emission rate based on its initial demonstration of the process and calculates VOC emission based on its chemical usage in paper machine #8.

The facility uses non contact cooling water drawn from St. Clair River. The facility discharges this water and filter backwash water to Black River. The treated process wastewater is discharged to St. Clair River. The E.B. Eddy Company also treats wastewater of Blue Water Fiber Company (Deinking Company) and discharges it to St. Clair River. The wastewater treatment involves use of chlorine, sodium metabisulfite, anhydrous ammonia, and phosphoric acid chemicals, and primary and secondary clarifiers. The facility monitors this discharge for biological oxygen demand (BOD) and total suspended solid (TSS) limits.

<u>Process Description</u>:

Purchased pulp is refined and then utilized in Paper Machines 6, 7, 8, and 9. Retention aid chemicals, sizing agents, wet strength chemicals, and biocides are added to the pulp. Process water is sent to the treatment water for treatment. Non contact cooling water is discharged without treatment.

VI Inspection

The E.B. Eddy Company was inspected on August 30, 1996. The inspector met Lupu,

Bentley, and Wagner and gathered information about the paper mill. After this, the inspector conducted inspection with Lupu and Bentley. The inspector visited the chemical storage areas, paper machine areas, boiler and stack areas, and the water treatment plant.

EPCRA INSPECTION FACILITY BACKGROUND INFORMATION

Facility Name: E.B. Eddy Paper Company Street Address: 1700 Washington Avenue City: Port Huron State: Michigan Zip: 48060 Phone: (810) 982-0191 SIC Code: 2 6 2 1 Dun & Brad #: 017 806 8045 Owner/Operator Information Name: E.B. Eddy Paper, Inc. Mailing Address: 1700 Washington Avenue City Port Huron State: Michigan Zip: 48060 Phone: (810) 982-0191	Contact Information Name: Howard L. Hunter Title: Director of Special Projects Date of Initial Phone contact: 8/13/96 Date of Inspection Announcement Letter: 8/19/96 Inspection Date: 8/30/96 Type of Inspection: To determine EPCRA compliance of Sections 302 304, 311, and 312, and CERCLA 103
ENTRY/OPENIN	IG CONFERENCE
Identification displayed? <u>Yes</u> Purpose of inspection explained? <u>Yes</u> Notice of inspection presented and signed by facility co Any attempt to deny entry? <u>No</u>	ntact? Yes
DESCRIPTION	N OF FACILITY
Fully describe facility operations: Paper manufacturing	facility. Purchases processed pulp.
When did site operations began? Pulp mill started in 19	988
Primary SIC Codes: 2 6 2 1	
Number of full-time employees 300 Annual sal	les \$_N/A
Relationship to other firms, parent corporation, subsidia E.B. Eddy Forest Products, Ottawa, Ontario, Canada	aries and location of off-site facilities: Subsidiary of
TITLE III COMP	LIANCE REVIEW
GRO	<u>DUND</u>
SECTION 302	
(1) Does facility have, on site, at any one time, extreme (HS) at or above the threshold planning quantity (TPQ)	

(2) List or obtain documentation:

Some of the chemicals used by the facility are listed below. Please refer to TIER II forms for inventory of the listed chemicals

CHEMICAL INVENTORY E.B. EDDY PAPER COMPANY PORT HURON, MICHIGAN			
Chemical name	* Maximum on site (lbs.)	Threshold planning quantity (TPQ) (lbs.)	
(a) Sodium hypochlorite	22,000	10,000	
(b) Sodium hydroxide	34,000	10,000	
(c) Sulfuric acid	55,000	1,000	
(d) Chlorine	10,000	100	
(e) Phosphoric acid	30,000	10,000	

^{*} All maximum quantities are listed on the TIER II forms (Attachment B)

How was maximum quantity on-site determined or calculated?

Maximum quantity was determined by inventory

State Emergency Response Commission (SERC) notified of EHS chemical per Sec. 302? Yes Date: 2/22/96

SECTION 303

Facility coordinator identified per Sec. 303 and date Local Emergency Planning Committee (LEPC) w	/as
notified? No	
Name/TitleD	Date:

Has the facility experienced any releases or discharges of EHS/HS chemicals at or above the reportable quantity (RQ)? No. The facility installed a new tank for ammonia storage in September 1995. On September 5, 1995, ammonia leak occurred when the installation contractor was installing the vaporizer loop heating assembly. Since the release was below the reportable quantity, the facility did not report it. Ho wever, the facility responded to a CEPPO letter in December 1995 and provided information (Attachment Q) which indicated that they initially estimated the release to be 17 pounds but revised it to 12.75 lbs after calculating the amount in the loop assembly (Exhibit Q).

Who Notified/Date/Time

NRC	 	
SERC	 	
LEPC-1	 	
LEPC-2	 	

For each of the above releases, hat LEPC(s) providing additional information (a) actions taken to respond and control (b) known or anticipated acute/chrus (c) where appropriate, advice removed.	rmation on: ontain the releas onic health risk	se? N/A		ovided to the SERC and
Date Sec. 304 (c) Notification _	(1)	(2)	(3)	
Who Reported		-		
Notification Adequacy _			MANUAL,	
Additional Comments				
Has the facility experienced any sp If yes,	oills to the grou	nd in the last 2	years? No	
Where there any evacuations? No				
Was the spill area excavated? Not If yes, where was the excavated m		disposal?		
What information does the facility The facility has a EPA IDa Oil facility in Detroit, and other so	# MID 0053582	247. Disposes v		
What cleanup concentrations were Not applicable				
If the spill area was not excavated,	what remediat	ion steps were t	aken? Not applicabl	e

<u>AIR</u>

SECTION 304

(a) What air permits does the facility have?

The facility is permitted by the Air Pollution Control Commission of Michigan (Attachment O). The facility has air pollution control commission permit for Wahlco So₃ flue gas conditioning system No. 5 Boiler (Permit #106-77) with emission limitations for sulfur dioxide, particulate and visual releases. The facility has permit requirements for VOC emissions from No. 8 Paper Mill (Permit #690-88) (Attachment D). The facility is required to test incoming coal for sulfur content and report it as sulfur dioxide, and monitor the coal boiler exhausts for opacity readings (Attachment E). There is a particulate emission limit of 0.28 lbs/1,000 lbs of exhaust gases, corrected to 50% excess air imposed by the State. However, the facility monitors the precipitator for its pressure drop and operates within a set of pressure drop values (Attachment F). The facility does not report any particulate emissions to the State. The following table provides permitted effluent limits for this facility. The state of Michigan has a federally approved State Implementation Plan (SIP) for

sulfur dioxide emissions (2.4 lbs per million BTU).

EFFLUENT LIMITS E.B. EDDY PAPER COMPANY PORT HURON, MICHIGAN			
COMPOUND/PARAMETER	EFFLUENT LIMIT	POUNDS/DAY LIMIT	
¹ Sulfur dioxide/Sulfur content of coal used in coal boilers is tested and calculated for its' potential sulfur dioxide emissions	2.4 lbs So ₂ /million BTU (1.5% sulfur content in coal)	3,974 for the 69 MMBTU/hr coal boiler	
Opacity of effluent gases connected with coal boiler	20 percent	N/A	
Particulate emission from coal boiler	0.28 lbs/1,000 pounds of exhaust gases	N/A	
Volatile organic compounds(VOCs)	17.1 lbs/hr	410.4	

The sulfur content of coal is to be tested prior to its' use in the coal boilers (Attachment G).

- (b) What equipment does the facility utilize to meet air permit requirements? Electrostatic precipitators (ESPs), Scrubbers, and stacks
- (c) How does the facility determine if its' releases are exceeding permit required concentrations?

 The facility has continuous monitoring equipment that records percent opacity of coal boiler emissions. The natural gas boilers are not monitored since they are below the 250 MMBTU/hr capacity.
- (d) Does the facility have following information for the period between the last 2 years and the date of inspection?

For coal boiler, opacity readings are available, recorded by continuous monitoring equipment. The coal is sampled prior to burning it.

AIR EMISSIONS E.B. EDDY PAPER COMPANY PORT HURON, MICHIGAN				
Regulated	Regulated Average effluent concentration			
Chemical/ Equipment Parameter Name Utilized		lbs/MMBTU	lbs/Day	State Limit (lbs/MMBTU)
So ₂	Stack	1.49 (May 22 - 29,1996)	2,467	2.4
Opacity (%)	ESP and stack	0% (August 30, 1997)	N/A	20%
Particulate ESP and stack No reporting done. Monitor pressure drop and operate the equipment within a set range of pressure drop				

The facility has VOC emission limit of 26.2 tons per year (17.1 lbs per hour maximum or 4.2 tons per month). The facility reports VOC emission by calculating the number of hours the chemicals are used on paper machine #8, and utilizing the demonstrated data of exhaust effluent. For July 1996 reporting period, the facility had a total VOC emission of 1.53 tons (Attachment H).

(e) Does the facility maintain records of equipment malfunctions/upsets/breakdowns? What procedures did the facility follow during the most recent equipment upset/breakdown?

Yes. Had opacity problems during the mechanical failure of boiler and when more oxygen was available during coal burning. No records were available to indicate analysis of the release during this mechanical failure.

(f) Does the facility have air emission records during the equipment malfunctions/upsets/breakdown periods?

The facility experienced a power outage in May of 1996 that incapacitated its opacity meter for 5 hours (Attachment I). The facility does not have any other means of knowing the opacity readings during such periods and also does not know if any permitted or non-permitted releases are occurring.

Has the facility experienced any permitted or non-permitted air releases? No

WATER

DISCHARGE PERMITS

- (a) What type of discharge permits does the facility have?
- (I) Direct discharge (ii) Treatment and discharge (iii) POTWs (iv) Other Direct discharge permits for non contact cooling water and treatment and discharge permit for process water. National pollutant discharge elimination system (NPDES) permit No. MI0002160 approves discharge to Black River (Attachments J, K, L, and M).
- (b) What equipment does the facility utilize to meet discharge requirements? Primary and secondary clarifiers, lagoons, and screening.
- (c) How does the facility determine if its' discharge is exceeding permit required concentrations?

 Monitor for biological oxygen demand (BOD), total suspended solids (TSS), and other metals
- (d) Does the facility maintain records of equipment malfunctions/upsets/breakdowns? Date of most recent equipment malfunction/upset/breakdown and procedures followed during that period?

Due to heavy rains in March 1996, (30 year storm) electricity failure occurred resulting in treated water, fresh water, and untreated wastewater from the treatment plant getting into the Black River. The facility notified the State on March 22, 1996, and also indicated that no sampling was conducted during this release (Attachment N). No notification was made to any other agencies.

(e) Does the facility have effluent records during the equipment malfunction/upset/breakdown periods? No. The facility stops its' operations during process upsets etc.

Has the facility experienced any discharges above the permit requirements? No

What treatments does the facility employ for surface water run-offs from the storage/transfer areas? Run-off water is sent to the water treatment system

Section 312

(1) Were Tier I or Tier II forms submitted for all required chemicals? Yes

Form Submitted (I or II)	SERC/Date	LEPC/Date	Fire Dept./Date
CY1993 II	2/21/94		
CY1994 II	2/21/95		
CY1995 II	2/22/96		

(2) What procedures are used to update Section 312 information for annual submittal and ensure additional or new chemical data is submitted within 90 days?

Christine Lupu, Environmental Engineer, updates chemical information (Attachment P)

(3) Is facility aware of annual reporting requirements under Section 312? Yes (Note: For covered chemicals where no inventory form has been provided, obtain specific maximum quantities (not ranges) for each chemical for each calendar year).

SUMMARY OF FINDINGS

The State mandated opacity limits and the Federal Regulated opacity limits are the same. The facility air permits could be federally enforceable since it is under SIP. No sulfur dioxide emsissions above permitted limits were noted.

FACILITY INSPECTION

Are facility operations and use of chemicals generally as described? Yes Inspection observations:

- (I) Any spill/release areas observed? No
- (ii) Describe NPDES discharge area: Maintained well
- (iii) Are there potential surface water runoff areas from the site? If yes describe. No

OPTIONAL INFORMATION

Surface water Route	
(I) Distance to nearest surface water	<u>300 feet</u>
(ii) Surface water use	Non potable
Groundwater Route	
(I) Groundwater use	<u>Potable</u>
(ii) Distance to nearest well	3-5 miles

	traphic and Property Information al population within one (1) mile <u>35,500</u>	two (2) miles	three (3) miles
(iii) Dis	tance to nearest population stance to nearest off-site building pulation within vicinity of site	300 feet 150 feet 5,000	
	EXIT CO	<u>NFERENCE</u>	
	s apparent deficiencies. Obtain commitment for ents section below (Note: do not discuss compli		
Ensure provide	facility has working knowledge of Title III and ed: Yes	reporting obligations. Title	e III informational materials
	t for documents provided (signed by facility cor Each document should be identified on a Receip		
Any co	onfidentiality claims asserted? No Explain	n in Comments Section	
	ents: The inspector received documents from the comments based on the inspection:	e facility which are listed in	the exhibits. The following
1)	The State of Wisconsin air emission reportable reportable quantities for coal boiler.	quantities are either less th	an or equal to the Federal
2)	The facility does not directly monitor particula within a predetermined pressure drop values be		
3)	The facility does not maintain operator logs du	ring opacity meter outages	due to electricity failures.
	As a follow-up of the inspection, the facility facoordinator as required under SARA Title III S		identifying facility
	ATTAC	CHMENTS	
<u>A)</u>	List of Chemicals		
B)	1995 TIER II Form and First 2 Pages of 1994	& 1993	
C) D) E)	Waste Manifests of 7/18/96 and 7/24/96		
<u>D)</u>	Process Map		
	Michigan Air Pollution Report - 1995		
<u>F)</u>	August 1996 Precipitator Log		

<u>G</u>)	Sulfur Sample Results - May 1996
H)	July 1996 Volatile Organic Compounds Emission Report from Paper Machine #8
I)	Summary Report April - June 1996 for Coal Boiler (#5)
J)	NPDES Discharge Monitoring Requirements - 8/27/96
K)	NPDES Discharge Monitoring Requirements - Operation Logs
L)	NPDES Discharge Monitoring requirements Update - June - July 1996
M)	NPDES Permit September 21, 1993
N)	Release Notification From Wastewater Treatment Plant - 3/22/96
O)	Air Permit March 30, 1977
P)	Follow-up Correspondence
Q)	Preamble to E.B. Eddy Paper, Inc, Response to U.S. EPA's CERCLA Section 104 (e) Request for
	Information

Date report completed: December 18, 1997 Prepared by: Raghu Nagam

Exhibits:

A.	Notice of Inspection	
B.	Receipt for Samples and Documents	
C.	Photo documentation	

Attachment A

List of Chemicals

LIST OF CHEMICALS FOR TITLE III SECTION 311 REPORTING E.B. EDDY PAPER, INC. - PORT HURON MILL

Hazardous Chemical	Names of Materials Containing Chemicals	Material Suppliers	Chemical Percent
Sulfur dioxide	Sulfur Dioxide	Rhone-Poulenc	100
Chlorine Sulfuric acid	Chlorine Sulfuric Acid	Jones Chem. PVS Chemicals/General Alum	100
Sulluric aciu	Sufful to Acid	& Chemical	100
	TexBrite 854	Texo Corp.	24
Aluminum sulfate	Alum, Liquid	General Chemical	49
Sodium hydroxide	Caustic Soda 50%	PVS Chemicals	50
•	Alkasan EB-5	PPG Chemicals	40
	Nalco 7680	Nalco Chemicals	55
	Nalco 8651	Nalco Chemical	3
	Texstrip 12	Texo Corp.	10
	Sodium Hypochlorite	TCS	2
Calaina Chlanida	Versenex 80	Ashland Chemical	1
Calcium Chloride	Calcium Chloride Flake	Dow Chemical	80
Sodium Hypochlorite	Sodium Hypochlorite # 2 Fuel Oil	TCS Mobil	14.1 74
Paraffins Fixed Carbon	Coal	Reiss	100
Titanium Dioxide	Titanium Dioxide	Kronos/Kemira	100
Clay	Calcined Kaolin	Engelhard	100
Limestone	Precipitated Calcium	Specialty Minerals/	100
E I III C B COIT C	Carbonate	Omya	100
Starch	Starch (Various Brands)	National Starch	100
D-Glucitol	Sorbitol 70	Ash1 and	´ 70
Sodium Metabisulfite	TCS 5700	TCS	30
Anhydrous Ammonia	Anhydrous Ammonia	LaRoche	100
Phosphoric Acid	Phosphoric Acid	TCS	75
CHEMICALS REPORTED A	AS MIXTURES:		
(mixture)	Genion 7023	General Chemical	100
(mixture)	FC-807	3M	100
(mixture)	Keydime D-10	Akzo Nobel, Inc.	100
(mixture)	Neutros	Akzo Nobel, Inc.	100
(mixture)	Nalco 7530	Nalco Chemical	100
(mixture)	Nalco 7533	Nalco Chemical	100
(mixture)	Nalcon 7647 Microbiocide	Nalco Chemical	100
(mixture)	Nalcon 7649 Microbiocide	Nalco Chemical	100
(mixture)	Talc	Luzenac	100
(mixture)	Hi-Phase_35	Hercules	100
(mixture)	Hercon 75	Hercules	100
(mixture)	Kymene Plus	Hercules	100
(mixture)	Hercon 79	Hercules	100

REVISION DATE: 2/22/96

E. B. EDDY PAPER, INC. INDEX of MSDS FOR CHEMICALS FOR TITLE III SECTION 311 REPORTING

Company or Manufacturer

3M Akzo Nobel Akzo Nobel Ashland Ashland Ashland Engelhard General Alum & Chemical * General Chemical

- * Hercules
- * Hercules
- Hercules * Hercules

Jones Chemical

Kronos * LaRoche Luzenac Nalco Nalco

Nalco Nalco Nalco Nalco

National Starch

Novacor PPG **PVS** PVS Reiss

Rhone-Poulenc

Speciality Minerals

* TCS

* TCS TCS

Texo

Texo

Chemical or Brand Name

FC-807

Keydime D10 Neutros Extra Calcium Chloride Sorbitol 70%

Versenex 80 Ansilex 93

Alum

Genion 7023 Hercon 75 Hercon 79 Hi-Phase 35 Kymene Plus Chlorine

Titanium Dioxide Anhydrous Ammonia

Talc Nalco 7530

Nalco 7533 Nalco 7647 Nalco 7649 Nalco 7680 Nalco 8651

Cato 232 #2 Fuel Oil Alkasan EB-5 Caustic Soda Sulfuric Acid Coal

Sulfur Dioxide

Precipitated Calcium

Carbonate

Phosphoric Acid

Sodium Hypochlorite

TCS 5700

Tex-Brite 854 Texstrip 12

* Revised 2-22-96

Attachment B

1995 TIER II Form and First 2 Pages of 1994 & 1993

3 - 3g /



E. B. EDDY PAPER, INC.

Phone: (810) 982-0191 Fax: (810) 982-7124

1700 Washington Ave. P.O. Box 5003 Port Huron, Michigan 48061-5003

February 22, 1996

Michigan Deptartment of Environmental Quality Environmental Assistance Division SARA Title III Office, Knapp's Office Centre P. O. Box 30457 Lansing, MI 48909

Dear Sir:

Please find enclosed E. B. Eddy Paper, Inc.'s SARA Title III, Section 312 report for 1995. As encouraged by the State of Michigan, Tier Two rather than Tier One information is being provided.

Also enclosed is an updated chemical list for Section 311 reporting. It contains seven new chemicals which are now being used on-site in reportable quantities. The MSDSs for these chemicals are enclosed and should be included in the bound set that was forwarded to this office in 1992.

Should you require any further information regarding this report, please let me know.

Christine of Super

Christine J. Lupu

Environmental Engineer

CJL: jbz

encl.

Gent Genion 75
Hercon 75
Hercon 79
Hercon 79
Kymone Plus
Kymone Ammonio
Ang. April
Sod. Hypt

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and the second s

Facility Identification		Dwner/Operator Name			
Tier Two E. B. EDDY PAPER, INC. 1700 WASHINGTON AVE.		E. B. EDDY PA 1700 WASHINGT		PHONE: (313)98 8/0 EX	82~0191. T
AND PORT HURON SAINT CLAIR	MI 48060	PORT HURON	MI 48060		
	8068045	Emergency Contact HOWARD L. HUN PHONE (2-13-)98		DIR <i>of Sufcial Project.</i> Tech. Director 63 24HR PH (2+3)984-9539 E	5
Specific OFFICIAL ID NO. 3998 Information USE ONLY Date Received		KEN WOOD 8/0 PHONE (616)68	984-4538	TITLE 8/0 984-9563 24HR PH (313)982-0193 E	
Important: Read all instructions before completing form	Reporting Period FROM J	ANUARY 1 TO DECEM	ABER 31, 1995	Check if information below is identical to the information submitted last year	
Chemical Description	Physical and Health Hazards (check all that apply)	NVENTORY	Container 1 ype Pressure Temperature	ge Codes and Locations (Non-Confidential) Storage Locations	Optional
CAS 0 0 7 6 6 4 4 1 7 Trade Secret Chem. Name Ammonia	Sudden Release	Max. Daily Amount (code)	A 2 6 See Ma	rp-#/	
	Reactivity 04	Avg. Daily Amount (code)			
Check all that apply Pure Mix Solid Liquid Gas EHS EHS Name Anhydrous Ammonia	Immediate (acute) Defayed (chronic)	3 No. of Days On-site (days)			
CAS 0 2 5 9 8 8 9 7 0 Trade Secret Chem. Name Key dine D-10	Fire O 4	Max. Daily Amount (code)	C 1 4 See Map	#9, [#] 23	
(Alkylketene dimer emulsion)	I of Pressure	Avg. Daily Amount (code)			
Check all that apply Pure Mix Solid Liquid Gas EHS		9 No. of Days On-site (days)			
EHS Name		1			
CAS Trade Secret Chem. Name Weutros	Sudden Helease	Max. Daily Amount (code)	C14 See Mag	2-#17 #26, #29 5-#17	
(Rosin Emulsion) Check all M M M	Reactivity 03	Avg. Daily Amount (code)			
that apply Aix Solid Liquid Gas EHS	Delayed (chronic) 30	円 No. of Days On-site (days)			
EHS Name					
Certification (read and sign after completing all sections)		111		OPTIONAL ATTACHMENTS	
t certify under penalty of law that I have personally examined and am long my inquiry of those individuals responsible for obtaining the informat			, and that based complete.	I have attached a site pla	
Howard L. Hunter, Director of Special Pr		THE -	<u>2/22/96</u> Date signed	I have attached a list of coordinate abbreviations I have attached a descript dikes and other safeguard	tion of

	Facility Identification		Owner/Operator Name			
Tier Two	E. B. EDDY PAPER, INC. 1700 WASHINGTON AVE.		E. B. EDDY PA		PHONE :	(343)982-0191 8/0 EXT
EMERGENCY AND						5, C EXT
HAZARDOUS	PORT HURDN SAINT CLAIR	MI 48060	PORT HURON	MI 48060		
CHEMICAL INVENTORY	SIC Code 2 6 2 1 Dun & Brad 1 7	8 0 6 8 0 4 5	Emergency Contact HOWARD L. HUI		DIR OF SPECIA	
<u>-</u>	ron		PHONE (313)98		TECH DIRECTOR 24HR PH (313)98	4-9539 EXT
Specific Information	OFFICIAL 10 NO. 3998		8/0 KEN WOOD 5/0		TITLE 810 98	94-9563
by Chemical	USE ONLY Date Received		PHONE (616)6		24HR PH (243)38	
Important: Rea	d all instructions before completing form	Reporting Period FROM	JANUARY 1 TO DECE	MBER 31, 1995	Check if information below to the information submitt	w is identical ed last year
		Physical		Store	age Codes and Loca	ations
Lhe	emical Description	and Health Hazards	INVENTORY	Container Type Pressure Temperatur	(Non-Confidential)	Options
		(check att that apply)			Storage Locat	ions
CAS	Trade Secret	Fire 04	Max. Daily Amount (code)	014 See ma	p- #26, #30, #1	77
Chem. Name <u>#</u>	i-Phase 35	Sudden Release			*//	
		Reactivity 04	Avg. Daity Amount (code)		· · · · · · · · · · · · · · · · · · ·	
Check all that apply	Mix Solid Liquid Gas EHS	Immediate (acute)	Table of Dave			
Pure	Mix Solid Liquid Gas EHS	Delayed (chronic) 36	5 No. of Days On-site (days)			
EHS Name						
					ا، الحد بان	
CAS	Trade Secret	Fire 0 4	Max. Daily Amount (code)	014 See ma	P-#11,#26,#3	30
Chem. Name <u>He</u>	rcen 75	Sudden Release of Pressure	71Δva Bailv	C14 See Ma	A-#10	
Chast all		Reactivity 0 4	Avg. Daily Amount (code)			
Check all that apply	Mix Solid Liquid Gas EHS	Immediate (acute)	No. of Days On-site (days)			
EHS Name	THIA SUTTO ENGINE GOS CHO	Delayed (chronic) 1518	On-site (days)			
Luz Maille						
	Trade		77 Max Daily		# # 4	
CAS L	Secret		Max. Daily Amount (code)	C14 See Ma	A - #17, 26, #;	29
Chem. Name Kv	mene PINS	Sudden Release of Pressure	Avg. Daily Amount (code)	014 See Mag	·-#17#30	
Check all			Amount (code)			
that apply Pure	Mix Solid Liquid Gas EHS	Delayed (chronic)	No. of Days			
EHS Name	·	Delayed (chronic)	p on-site toaysi			
			•			
Certification	(read and sign after completing all sections)			<u>-</u>	OPTIONAL ATTAC	:
	penally of law that I have personally examined and am I	amiliar with the information summi	led in pages the phough	// , and that based	<u> </u>	ed a site plan
	I those individuals responsible for obtaining the informat				1 LZX	ed a site plan ed a list of site
Howard	L. Hunter, Director of Speci	al Projects////	Mil	2/22/96	coordinate abl	
Name and officia	l title of owner/operator OR owner/operator s authorized	representative Signature	,,,	Date signed		er safeguard measures

	~				
Page	<u> </u>	of	11_	pages	-

	Facility: Identification		Dwner/Operator Name	
Tier Two EMERGENCY	E. B. EDDY PAPER, INC. 1700 WASHINGTON AVE.		E. B. EDDY P 1700 WASHING	
AND HAZARDOUS	PORT HURON SAINT CLAIR	MI 48060	PORT HURON	MI 48060
CHEMICAL INVENTORY	SIC Code 2 6 2 1 Dun & Brad 1 7	8 0 6 8 0 4 5	Emergency Contact HOWARD L. HU	NITED TEAM TO THE
Specific Information by Chemical	FOR OFFICIAL USE ONLY Date Received		PHONE (343)9 KEN WOOD 8/0 PHONE (616)6	984-9538 TITLE \$10 984-9563
Important: Rea	d all instructions before completing form	Reporting Period FROM	ANUARY 1 TO DECE	MBER 31, 1995 Check it information below is identical to the information submitted last year
Che	mical Description	Physical and Health Hazards (check all that apply)	NVENTORY	Storage Codes and Locations (Non-Confidential) Storage Locations
CAS Chem. Name He	Trade Secret	Sudden Release	Max. Daily Amount (code) Avg. Daily	C14 See Map. #9,#23
Check all that apply Pure	Mix Solid Eiquid Gas EHS	X Immediate (acute)	Avg. Daily Amount (code) No. of Days On-site (days)	
EHS Name				
CAS Chem. Name 6	Trade Secret Secret	Sudden Release	Max. Daily Amount (code)	C14 See Mep #26, #29
Check all that apply Pure	Mix Solid Liquid Gas EHS	Immediate (acute)	Avg. Daily Amount (code) No. of Days On-site (days)	
	spheria Acid	Sudden Release	Max. Daily Amount (code) Avg. Daily Amount (code)	C 1 4 See Map - #38
Check all that apply Pure	Mix Solid Liquid Gas EHS	Immediate (acute) Delayed (chronic)		
EHS Name			•	
Certification	read and sign after completing all sections)	-l		OPTIONAL ATTACHMENTS
on my inquiry o	renalty of law that I have personally examined and am fa I those individuals responsible for obtaining the information L. Hunter, Director of Special I title of owner/operator OR owner/operator s authorized	on, I believe that the submitted that		and that based

	Facility Identification			Owner/Operator Name	\$1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -		2 (2.2
Tier Two	E. B. EDDY PAPER, INC.			E. B. EDDY P		. PHONE: (3-73)982-019	3 1
EMERGENCY	1700 WASHINGTON AVE.			1700 WASHING		8/0 EXT	
AND HAZARDOUS	PORT HURON SAINT CLAIR	MI 48060)	PORT HURON	MI	48060	
CHEMICAL	SIC Code 2 6 2 1 Dun & Brad 1 7	8068045	;	Emergency Contact		DIR OF SPECIAL PROJECTS	
INVENTORY	Sit code Number			HOWARD L. HL		T ECH. DIRECTOR -	
Specitic	FOR 10 ND. 3998			PHONE (913)9			
fiformation by Chemical	USE ONLY Date Received			KEN WOOD BIC PHONE (616)6	<i>984-95</i> 38 184-5500 E)	TITLE <u>\$10 984-9563</u> XT 24HR PH (313)9 82-0193 EXT	_
Important: Rea	ad all instructions before completing form	Reporting Period	FROM J	ANUARY 1 TO DECE	MBER 31.	1995 Check if information below is identical to the information submitted last year	
		Physical			ture	Storage Codes and Locations	- E
Che	emical Description	and Health Hazards	l	NVENTORY	Container Type Pressure Temperate	(Non-Confidential)	Ортіопа
		(check all that apply)			CONTRACT TO THE	Storage Locations	
CAS 0 0 7	7 8 2 5 0 5 Trade Secret	Fire	nu	Max. Daily Amount (code)	L24	See Non #3	
Chem. Name		Sudden Release		Ainbunt (code)	Lay	See Map - #3 See Map - #25	-
		of Pressure Reactivity	03	Avg. Daily Amount (code)			-
Check all that apply	Mix Solid Eiguid Gas EHS	Immediate (acute)					- [
-		Delayed (chronic)	36	5 No. of Days On-site (days)			- }
EHS Name	Horine						
							-
	146095 Trade Secret	Fire	04	Max. Daily Amount (code)	Aa3	See Map-#5	_
Chem. Name 5v	Ifur Dioxide	Sudden Release of Pressure	Г=Т.,	Ava Daily			_
Charle all		Reactivity	04	Avg. Daily Amount (code)			_
Check all that apply Pure	Mix Solid Liquid Gas EHS	Immediate (acute)	21/	5 No. of Days On-site (days)			_
	Hur Dioxide	Delayed (chronic)	1016	On-site (days)			, , ,
EH2 Name	HAVE BLOXICE						
	/ / LJ Q 2 Q Trade			May Baily	1,-1	1	
CAS 007		fire	04	Max. Daily Amount (code)	C1 4 E1 4	See Map -# 2, # 8, # 26, # 38	.
Chem. Name	usturic Acid	Sudden Release of Pressure	lo lu	Avg. Daily	E/4	See Map-#2, #11, #14, #17, #18, #21, #22	-
Check all		Reactivity	רוטן	Avg. Daily Amount (code)		<i>*23,*26,*33</i>	-
Check all that apply Pure		Immediate (acute)	1316	No. of Days On-site (days)			
EHS Name Su	Ifiric Acid	Delayed (chronic)	1-1-	- Jon Site (days)			-
				•			┙┃┖╌┦
Certification	(read and sign after completing all sections)					OPTIONAL ATTACHMENTS	
	penalty of law that I have personally examined and am f					nar based \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
	of those individuals responsible for obtaining the informati	<i>-</i>	burine into	tration is true accurate an	•	I have attached a list of site	
	L. Hunter, Director of Specia		K.	My)		/22/96 coordinate abbreviations L have attached a description of	
Name and officia	al title of owner/operator Offlowner/operator s authorized	representative / Signatu	ite /	$\boldsymbol{\nu}$	Date signed	dikes and other safeguard measur	res

Facility Identifi	cation / i		Owner/Operator Name			
	Y PAPER, INC. Ington ave.		E. B. EDDY P 1700 WASHING		PHONE: (343)982-01	91
AND PORT HURO	N SAINT CLAIR	MI 48060	PORT HURON	MI 48060		
CHEMICAL SIC Code 2 6	2 1 Dun & Brad 1 7	8068045	Emergency Contact HOWARD L. HU	NTER	DIA OF SPECIAL PROJECTS TECH DIRECTOR 63	
Information USE	NO. 3998		PHONE (343)9 KEN WOOD 814 PHONE (-616)6		24HR PH (313)984-952 EXT TITLE 810 984-9563 24HR PH (313)982-0193 EXT	
Important: Read all instructions	before completing form	Reporting Period FR	OM JANUARY 1 TO DECE	MBER 31, 1995	Check if information below is identical to the information submitted last year	
Chemical Descri	otion	Physical and Health Hazards (check still that apply)	INVENTORY	Container Type Pressure Temperature	age Codes and Locations (Non-Confidential) Storage Locations	Optional
cas 0 1 0 0 4 3 0	Trade Secret	Fire (0 5 Max. Daily Amount (code)	CTIYI See M	αρ.#9, #0, #30 #36	
Chem. Name Alvainum	Suifate (Alum)	Sudden Release	O Y Avg. Daily Amount (code)			_
Check all that apply	Liquid Gas EHS	Immediate (acute)				-
Pure Mix Solid	Liquid Gas EHS	Delayed (chronic)	365 No. of Days On-site (days)			_ }
EHS Name						
cas 010043 5		Fire (0 4 Max. Daily Amount (code)	J14 See Ma	p - #3/, #35	
Chem. Name (a cium Ch)	oride	Sudden Release	O 4 Avg. Daily Amount (code)			_ _
Check all that apply Pure Mix Solid		Immediate (acute)				-
Pure Mix Solid	Liquid Gas EHS	Delayed (chronic)	3 6 5 No. of Days On-site (days)			_
EHS Name						
cas 0 0 1 3 3 2 5	7 Trade Secret	Fire	O 5 Max. Daily Amount (code)	514 See Mas	1-#31 #35	
Chem. Name Clay		Sudden Release of Pressure		CI4 See Ma	ρ-#31 #35 ρ-#9,#36	_
Check all			O 5 Avg. Daily Amount (code)			-
Check all that apply Pure Mix Solid	Eiguid Gas EHS	Delayed (chronic)	365 No. of Days On-site (days)			-
EHS Name		الكا				
Certification (read and sign a	fter completing all sections)				OPTIONAL ATTACHMENTS	
	I have personally examined and am I		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	// and that based	I have attached a site plan	
	responsible for obtaining the informati		de Anioration is the Accurate and	•	I have attached a list of site coordinate abbreviations	
Howard L. Hunter, Dir	erator OR owner/operator s authorized		//M	2/22/96 Date signed	I have attached a description of dikes and other safeguard measurements	

	Facility Identification		Owner/Operator Name			
Tier Two	E. B. EDDY PAPER, INC. 1700 WASHINGTON AVE.		E. B. EDDY P 1700 WASHING		PHONE:	(213)982-0191 8/0 EXT
EMERGENCY AND	1	NT 48000			•	<i>D</i>
HAZARDOUS		MI 48060	PORT HURON	MI 4806		
CHEMICAL INVENTORY	SIC Code 2 6 2 1 Dun & Brad 1 7	8 0 6 8 0 4 5	HOWARD L. HU	NTFD	DIR OF SPECIAL PH	63
	FOR 10 NO. 3998		7 PHONE (3/13)9		24HR PH (3-13)984	
Specific Information by Chemical	OFFICIAL USE		KEN WOOD 8/C		TITLE <u>810 984</u>	1- 95 63
	ONLY Date Received	Reporting Period FROM	JANUARY 1 TO DECE		Check if information below to the information submitted	
mipurtant. Her	an instructions before completing fulfit	Physical PROM	UANUARY I TO DECE	9 6.	er ig angele fra far fra 1940 ang	
Che	emical Description	and Health Hazards (check att that apply)	INVENTORY	Container Type Pressure Temperatu	rage Codes and Locati (Non-Confidential) Storage Location	ig .
Cas T T T	Trade		Max. Daily			
CAS	xed Carbon (cog)	fire Sudden Release	Max. Daily Amount (code)	RI4 See A	lap-#7	
Cheffi. Name / /	Act carpore (coar)	of Pressure Reactivity	Avg. Daily Amount (code)			
Check all that apply		Immediate Jacoba				
Pure Pure	Mix Solid Liquid Gas EHS	Delayed (chronic) 36	No. of Days On-site (days)			
EHS Name						
CAS 0000	05070 4 Trade Secret	Fire OL	Max. Daily Amount (code)	1014 See M	ap -#16,#17,#27	7 #33
Chem. Name D	- 6 lucital (700 in Sorbital 70)	Sudden Release	-			
Chark all		Reactivity	Avg. Daily Amount (code)			
Check all that apply	Mix Solid Liquid Gas EHS	Immediate (acute)	5 No. of Days On-site (days)		······································	
EHS Name		Delayed (chronic)	On-site (days)			·
Eng wante						
CAS 0 0 0 1	067630 Trade Secret	Mfire 0	Max. Daily Amount (code)	10114 Sec 1	lap-#16, #28, #=	20
Chem. Name F	C 807	Sudden Release	[Amount (code)	1101111	пр 10, ш, _	3
(Mixture of Isa	proponol+Fluoroaliphetic Ammonia Salts	Reactivity 03	Avg. Daily Amount (code)			
Check all that apply	Mix Solid Liquid Gas EHS		- -			
Pure	Mix Solid Liquid Gas EHS	Delayed (chronic)	65 On-site (days)			
EHS Name						
	(read and sign after completing all sections)		1, 11	;)	OPTIONAL ATTACH	MENTS
	penally of law that I have personally examined and am fa of those individuals responsible for obtaining the informati			// , and that based d complete.	I have attached	•
Howard L. H	Nunter, Director of Special Pro	ojects X. N	1/1/2	2/22/96	l have attached coordinate abbre	eviations
Name and ollici	al litte of owner/operator OR owner/operator s authorized	representative Signature	11000	Date signed		a description of safeguard measures

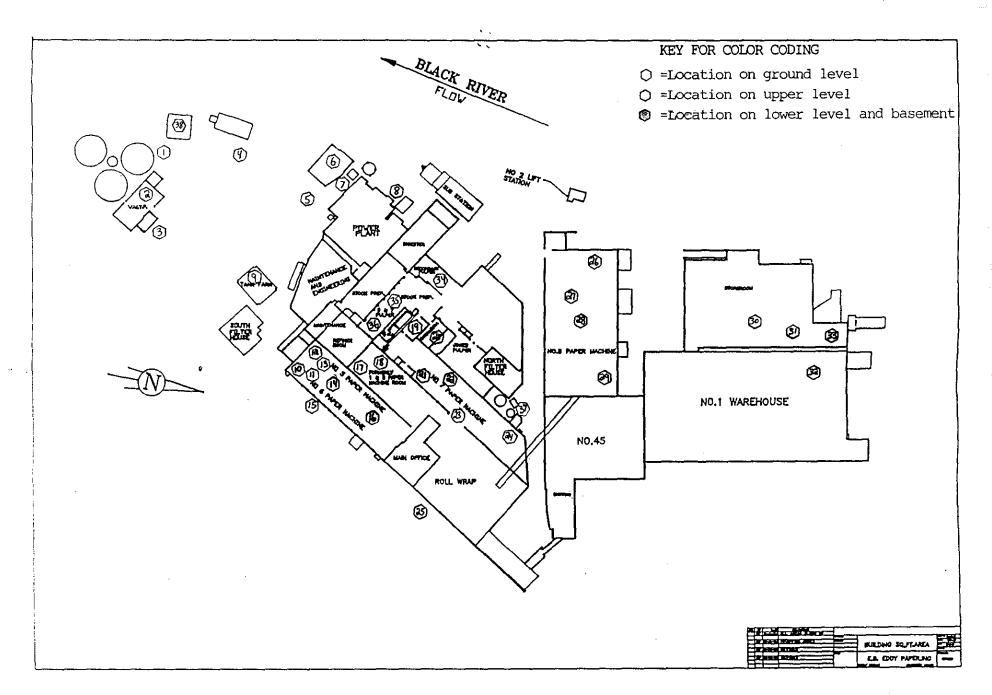
	Facility Identification			Dwner/Operator Name	s gan s s			
Tier Two EMERGENCY	E. B. EDDY PAPER, INC. 1700 WASHINGTON AVE.			E. B. EDDY P 1700 WASHING		PHONE :	(313)982-0191 8/3 EXT	1
AND HAZARDOUS	PORT HURON SAINT CLAIR	MI 48060	ı	PORT HURON	MI	48060		
CHEMICAL INVENTORY	SIC Code 2 6 2 1 Oun & Brad 1 7	8 0 6 8 0 4 5]	HOWARD L. HU		DIR OF SPECIAL	R 63	
Specific Information by Chemical	FOR OFFICIAL ID NO. 3998 USE ONLY Date Received			PHONE (343)9. KEN WOOD \$10 PHONE (616)6	984-9538	24HR PH (343) 3/D TITLE <u>8/0 9</u> 24HR PH (313)	84-9563	_
Important: Rea	d all instructions before completing form	Reporting Period	FROM J	ANUARY 1 TO DECE	MBER 31, 198	95 Check If information be	elow is identical nitted last year	_
Che	mical Description	Physical and Health Hazards (check all that apply)	IJ	NVENTORY	Container Type: Pressure Temperature	Storage Codes and Lo (Non-Confidential Storage Loc		Optional
CAS 06 97 Chem. Name No Chydrotreat Check all that apply	· · · · · · · · · · · · · · · · · · ·	fire Sudden Release of Pressure Reactivity Immediate (acute)	014	Max. Daily Amount (code) Avg. Daily Amount (code)		see Map - #2 #17 ce Map - #17, #30		
Pure EHS Name	Mix Solid Liquid Gas EHS	Delayed (chronic)	36	ろの-site (days)				
CAS O 6 4 7 Chem. Name Va (Hydro Trea Check all that apply Pure	lco 75 33	Fire Sudden Release of Pressure Reactivity Immediate (acute) Delayed (chronic)	04	Max. Daily Amount (code) Avg. Daily Amount (code) No. of Days On-site (days)	0143	See Map - #2, #19 # see Map - #2, #27, #	37	
								L
CAS O Q 6 Chem. Name N (A queous So Check all that apply Pure EHS Name	172554 ITade Secret Valcon 7647 Notion of Substituted Isothiazoline Mix Solid Liquid Gas EHS	Fire Sudden Hetease of Pressure Reactivity Immediate (acute) Delayed (chronic)	04	Max. Daily Amount (code) Avg. Daily Amount (code) No. of Days On-site (days)	0145	iee Mep-#18, #24, #	H, #30	
		<u> </u>		-				
t certify under pon my inquiry of Howard L. H	read and sign after completing all sections) lenally of law that I have personally examined and am fail those individuals responsible for obtaining the information unter, Director of Special Pro I title of owner/operator OR owner/operator s authorized r	n. I believe that the sub ojects			// and that to complete. 2/22/96 Date signed	l have attac	ACHMENTS Thed a site plan Thed a list of site Abbreviations Thed a description of other safeguard measure	s

	Facility Identification		Owner/Operator Name		
Tier Two EMERGENCY	E. B. EDDY PAPER, INC. 1700 WASHINGTON AVE.		E. B. EDDY PA 1700 WASHINGT		(313)982-0191 EXT
AND HAZARDOUS	PORT HURON SAINT CLAIR	MI 48060	PORT HURON	MI 48060	
CHEMICAL INVENTORY	SIC Code 2 6 2 1 Oun & Brad 1 7	8 0 6 8 0 4 5	HOWARD L. HUN	DIR OF SOECT	142 ROJECTS 0R- 1984-9529 EXT
Specific Information by Chemical	FOR OFFICIAL ID NO. 3998 USE ONLY Date Received		PHONE (333)98 KEN WOOD 8/0 9 PHONE (616)68	54-9538 TITLE 8/0	984-9589 EXT 984-9563)982-0193 E XT
Important: Rea	d all instructions before completing form	Reporting Period FROM J	ANUARY 1 TO DECEM	BER 31, 1995 Check if information su	below is identical bmitted last year
Che	mical Description		VVENTORY	Storage Codes and L	
Chem. Name 🚶	alcon 7649	Sudden Release	Max. Daily Amount (code)	014 See Map-#18 #31	2
Check all	Diocide)	Reactivity 04	Avg. Daily Amount (code)		
that apply Pure	Mix Solid Liquid Gas EHS	Immediate (acute) 36	5 No. of Days On-site (days)		
EHS Name					
	76302 Trade Secret	Fire Sudden Release	Max. Daily Amount (code)	A14 See Mas - #6	
Chem. Name Pa	raffins No.2 Fuel Oil)	I ni Praecura	Avg. Daily Amount (code)		
Check all that apply Pure	Mix Solid Liquid Gas EHS	X Immediate (acute)	5 No. of Days On-site (days)		
EHS Name			• •		
CAS O O O L	ipitated Calcium Carbonate	Sudden Refease	Max. Daily Amount (code)	C 1 4 See Map - # 9 5 1 4 See Map - # 3)	
Check all that apply		Immediate (acute)	Avg. Daily Amount (code)	STITE SEE TROP ST	
Pure EHS Name	Mix Solid Liquid Gas EHS	Delayed (chronic) 36	5 No. of Days On-site (days)		
			·		
	(read and sign after completing all sections)		1, 11	OPTIONAL AT	TACHMENTS
on my inquiry o	penalty of law that I have personally examined and am f I those individuals responsible for obtaining the informati	on, I believe that the عubmitted into.		complete.	tached a site plan tached a list of site
	unter, Director of Special Production of owner/operator Officer of owner/operator s authorized		M	2/22/96 coordinate	e abbreviations tached a description of tother safeguard measures

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Page		of	_//	pages

	Facility Identification		Dwner/Operator Name				
Tier Two EMERGENCY	E. B. EDDY PAPER, INC. 1700 WASHINGTON AVE.		E. B. EDDY PAPE 1700 WASHINGTON	R, INC.	PHONE:	(313) 982-0191 810 EXT	
AND HAZARDOUS	PORT HURON SAINT CLAIR	MI 48060	PORT HURON	MI 48060)		
CHEMICAL INVENTORY	SIC Code 2 6 2 1 Dun & Brad 1 7	8068045	Emergency Contact HOWARD L. HUNTE	R	DIR OF SPEC	IAL PROJECTS	
Specific	FOR 10 NO. 3998		PHONE (3/3)984-	_	24HR PH (3+3)9		l
Information by Chemical	USE ONLY Date Received		KEN WOOD 810 484 PHONE (616)684-	i i	TITLE <u>6/0</u> 24HR PH (313)		
Important: Rea	d all instructions before completing form	Reporting Period FROM J	ANUARY 1 TO DECEMBE	ER 31, 1995	Check if information be to the information subm	low is Identical itted last year	
Che	mical Description	Physical and Health Hazards	NVENTORY (Supplied)	Type Pressure Temperature	rage Codes and Lo (Non-Confidential Storage Loc		Optional
CAS 0 0 1 3	divm Hydrexicle	Sudden Helease	Max. Daily Amount (code)		p-#2,#8#17 p-#2,#14#1 #23,#26,#	#26 5,#18,#2)	
Check all that apply Pure	Mix Solid Liquid Gas EHS	Immediate (acute)	Avg. Daily Amount (code) S No. of Days On-site (days)		#23, #26,#	33	
CAS O O 7 & Chem. Name S o	dium Hypochlorite Solid Liquid Gas EHS	Sudden Release of Pressure Reactivity Vignatizate (South)	Max. Daily Amount (code) Avg. Daily Amount (code) 5 No. of Days On-site (days)	1 4 See Ma	p-#22,#26 p-#2,#18,#22	, [#] 26, [#] 33	
EHS Name							
Chem. Name Soc	18 1 57 4 Trade Secret Norm Metabisulfate TCS 5700) Mix Solid Liquid Gas EHS	Sudden Release	Avg. Daily Amount (code)	014 See M	rp-#3,#30		
Certification	(read and sign after completing all sections)		1		OPTIONAL ATTA	L L	
l certily under on my inquiry of Howard L. H	penalty of law that I have personally examined and am for those individuals responsible for obtaining the information of special Probabilities of owner/operator OR owner/operator s authorized	on, I believe that the submitted into	manon is two socurate and con	and that based mplete. 2/22/96 te signed	I have attac	ched a site plan ched a list of site abbreviations ched a description of other safeguard measures	:

	Facility Identification		Owner/Operator Name			
Tier Two EMERGENCY	E. B. EDDY PAPER, INC. 1700 WASHINGTON AVE.		E. B. EDDY P. 1700 WASHING		PHONE: (213)982-0	191
AND HAZARDOUS	PORT HURON SAINT CLAIR	MI 48060	PORT HURON	MI 48060	•	
CHEMICAL INVENTORY	SIC Code 2 6 2 1 Dun & Brad 1 7	8068045	HOWARD L. HU		DIR OF SPECIAL PROJECTS	4. 4
Specific Information by Chemical	FOR OFFICIAL ID NO. 3998 USE ONLY Date Received		PHONE (313)9. KEN WOOD 810 PHONE (648)6	984-9538	TITLE 8/0 984 9563 24HR PH (313)984-9533 EXT TITLE 8/0 984 9563 24HR PH (313)982-0193 EXT	
Important: Rea	d all instructions before completing form	Reporting Period FR	OM JANUARY 1 TO DECE	MBER 31, 1995	Check II information below is identical to the information submitted last year	
Che	mical Description	Physical and Health Hazards (check at that apply)	INVENTORY	- Principle of the Control of the Co	age Codes and Locations (Non-Confidential) Storage Locations	Optional
CAS Shem. Name 5	tarch Trade	Sudden Release	O 5 Max. Daily Amount (code)		p-#3> 1p-#17,#27,#31,#32	
Check all that apply Pure	Mix Solid Liquid Gas EHS	Immediate (acute)	Avg. Daily Amount (code) No. of Days On-site (days)			
EHS Name	•					_
CAS O 1 4 8	707966 Trade Secret	Sudden Release	OY Max. Daily Amount (code)	514 See Ma	·p-#20,#32,#35	
Check all		of Pressure Reactivity	O 4 Avg. Daily Amount (code)			_
that apply Pure	Mix Solid Liquid Gas EHS	Immediate (acute) Delayed (chronic)	365 No. of Days On-site (days)		-	_ _
End Humb						
	163677 Trade Secret	Sudden Release	O 5 Avg. Daily O 5 Amount (code)	CI 4 See M JI 4 See Ma	ap-#9,#17,#22 o-#20,#31,#35	
Check all that apply Pure	Mix Solid Liquid Gas EHS		365 No. of Days On-site (days)			
EHS Name						
Certification	read and sign after completing all sections)		///		OPTIONAL ATTACHMENTS	L
1 certily under p on my inquiry of Howard L. H	renally of law that I have personally examined and am la those individuals responsible for obtaining the informati unter, Director of Special Pro Little of owner/operator OR owner/operator s authorized	on, I believe that the Subspire		, and that based complete. 2/22/96 Oate signed	I have attached a site plan I have attached a list of site coordinate abbreviations I have attached a description of dikes and other safeguard meas	f sures



	Facility Identification			Owner/Operator Name	óly.			0.5	
Tier Two	E. B. EDDY PAPER, INC.		1	E. B. EDDY P		o.˙	PHONE:	\$70 (313)982-019	1
EMERGENCY	1700 WASHINGTON AVE.			1700 WASHING	ION AVE.			EXT	
AND HAZARDOUS	PORT HURON SAINT CLAIR	MI 48060	ı	PORT HURON	М	I 48060			
CHEMICAL	SIC Code 2 6 2 1 Bun & Brad 1 7	8068045	7	Emergency Contact	4.4		A TO THE MEAN OF THE PROPERTY		
INVENTORY	Number Number			HOWARD L. HUI			TECH. DIRECTOR	A AFAA EYT	
Specilic	FOR OFFICIAL ID NO. 3998			PHONE (3+3)9			24HR PH (343)984 810 98		
Information by Chemical	USE ONLY Date Received			bhone (212)2 Ken Mood(310) ₀			TITLE \$10 95	<u>5 -3644</u> 2-0193 Ext	_
Important: Rea	d all instructions before completing form	Reporting Period	FROM J	ANUARY 1 TO DECE	MBER 31	1993	Check if information below to the information submitte	is identical d last year	
	지정말살살이 뭐하죠 하는 것이다.	Physical			7 a a	Stora	ge Codes and Local	tions	Optional
Che	emical Description	and Health Hazards	!]	NVENTORY	Container Type Pressure Temperatur		(Non-Confidential)	ial)	
		(check all that apply)			원동		Storage Locati	ons	
CAS 007	782505 Trade Secret	Fire	Пu	Max. Daily Amount (code)	L 24	Se map	±3		
Chem. Name C		Sudden Release	1911	Annount (code)	L 3 4	Sie map		 	Ì
		of Pressure Reactivity	03	Avg. Daily Amount (code)		-XC MAP			
Check all that apply	Mix Solid Liquid Gas EHS								
Check all that apply Pure Mix Solid Liquid Gas EHS		Delayed (chronic)	36	5 No. of Days On-site (days)					
EHS Name Chlorine									
					LL	<u> </u>			البيا
CAS 0071	146095 Trade Secret	Fire	ОЧ	Max. Daily Amount (code)	A25	See map	# 4		
	1500 Diexide	Sudden Release of Pressure	الل	Amount (code)		<u></u>			
		Reactivity	04	Avg. Daily Amount (code)					
Check all that apply Pure	Mix Solid Liquid Gas FHS	Immediate (acute)					<u> </u>		
	and the second s	Delayed (chronic)	365 No. of Days On-site (days)						
EHS Name 50	19us Dioxide					· · · · · · · · · · · · · · · · · · ·			
									L1
CAS 0076	3 9 Trade Secret	fire	०प	Max. Daily Amount (code)	C 1 4	S. mad	- #2, #5 #26		
Chem. Name		Sudden Release	[<u>~</u> _]].	Amount (code)	EIL	See map.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	#22,#24	
		Of Pressure Reactivity	04	Avg. Daily Amount (code)		vec map	#25 #21 #33	, 44, 47	
Check all that apply		Immediate (acute)				-	35, 34, 34		
Pure	Mix Solid Liquid Gas EHS	Delayed (chronic)	36	5 No. of Days On-site (days)					
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Certification (read and sign after completing all sections) OPTIONAL					OPTIONAL ATTACH	HMENTS			
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1 1	on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted after				l complete.	nal		d a list of site	:
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	Facility Identification		Owner/Operator Name			
Tier Two EMERGENCY	E. B. EDDY PAPER, INC. 1700 WASHINGTON AVE.		E. B. EDDY PAPE 1700 WASHINGTON	R, INC.	PHONE (810)982-0191 EXT	
AND HAZARDOUS	PORT HURON SAINT CLAIR	MI 48060	PORT HURON	MI 48060		
CHEMICAL INVENTORY	SIC Code 2 6 2 1 Dun & Brad 1 7	806 8045	Emergency Contact HOWARD L. HUNTI PHONE (810)984		TECH. DIRECTOR 24HR PH (810)985-8644 EXT	
Specific Information by Chemical	FOR OFFICIAL ID NO. 3998 USE ONLY Date Received		KEN WOOD PHONE (810)984		TITLE 24HR PH (810)985-8644 EXT	
Important: Rea	nd all instructions before completing form	Reporting Period FROM	JANUARY 1 TO DECE	MBER 31, 1994	Check if information below is identical to the information submitted tast year	
Cho	emical Description	Physical and Health Hazards Icheck all that apply)	NVENTORY	Container Type Pressure Temperature	Storage Codes and Locations (Non-Confidential) Storage Locations	Optional
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Howard	fread and sign after completing all sections) penalty of law that I have personally examined and am for those individuals responsible for obtaining the informati L. Hunter, Technical Direct at title of owner/operator OR owner/operator s authorized	ion, I believe that the submitted for	ord in pages on through	11 and that based complete. 21 FEB 95 Date signed	OPTIONAL ATTACHMENTS I have attached a list of site coordinate abbreviations I have attached a description of dikes and other safeguard measure	es

Attachment C

Waste Manifests o 7/18/96 and 7/24/96

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE DIS. \square REJ. 🗆

Failure to file is punishable under section 299:548 MCL or Section 10 of Act 136, PA. 1989.

PR.

Required under authority of Act 64, PA 1979, as amended and Act 136, PA 1969.

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GENERATOR 14 COPY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1800-282-4706 OR OUT OF STATE AT 517-373-7860 AND THE NATIONAL RESPONSE CENTER AT 1900-424-8802 24 HOURS PER DAY. AND

EPA Form 8700-22 (Rev. 9/88)



, DO NOT WRITE IN THIS SPACE ATT. DIS. REJ. PR. PR. Required under authority of Act 64, PA 1979, as amended and Act 136, PA, 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969:

> PR 5110 Rev. 10/92

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Attachment D

Process Map

Attachment E

Michigan Air Pollution Report - 1995

AG30, EQUIPMENT IDENTIFICATION 1995 - CONTINUATION THIS MERGAMARION REQUIRED UNDER THE NATURAL AFFORM PROTECTION ACT. SHAPER PROTECTION ACT. THE VALUE AND SHAPER AFFORM PROTECTION ACT. THE VALUE AFF

Note: Current information is pre-printed below each boxed area. If pre-printed information is incorrect or missing, type in above the boxed areas or hand print in boxed areas for changes and additions.

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EQP5609 (REV 10/95)

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Note: Current information is pre-printed below each boxed area. If pre-printed information is incorrect or missing, type in above the boxed areas or hand print in boxed areas for changes and additions.

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DEQ USE ONLY 1. ADD 2. CHANGE 3. DEL 4. OK					
	THRUPUT IN THE UNITS SPEC	IFIED IN THE	INSTRUCTION BO	OOKLET, TABLE	v.

EQP5609 (REV 10/95)

Note: Current information is pre-printed below each boxed area. If pre-printed information is incorrect or missing, type in above the boxed areas or hand print in boxed areas for changes and additions.

PLEASE REFER TO GENERAL INSTRUCTIONS BOOKLET FOR MORE DETAILED INSTRUCTIONS

PLEASE HEFER TO GENERAL INSTRU		Sit MO.IL DE.	AILLO II	10111001.0.10	**-	
8 STATE REGISTRATION NUMBER	POINT NUMBER	NOTE IS IT	IS NECE	COADY TO EUL	OUT MORE SCC	COREO TUANE
		THIS FORM	ALLOWS.	, FILL OUT AN A	DDITIONAL FORM NUMBER MUST I	M. THE STATE
B6420	005	ON THE ADD			MOMBER MOST	SE INDICATED
SCC CODE	MATERIAL THRUPU	т	UNIT CODE	% SULFUR	% ASH	% voc
9	00000016.00	4.50	08	00.00	00.00	000.00
co	MMENT:					
DEQ USE ONLY 001 1. ADD						
☐ 3. DEL ☐ 4. OK	BLR 10-1	100 MMBTUH	, NAT	G AS	·	
				•	•	
cor	MMENT:					
DEQ USE ONLY 1. ADD 2. CHANGE 3. DEL 4. OK						
13		_ •				
con	MMENT:					
DEQ USE ONLY						
		•		•	•	
cor	MMENT:					
DEQ USE ONLY 1. ADD 2. CHANGE 3. DEL 4. OK						
		•		•		•
	MMENT:					
DEQ USE ONLY 1. ADD 2. CHANGE 3. DEL 4. OK						
14						
		•		•	•	•
DEQ USE ONLY 1. ADD 2. CHANGE 3. DEL 4. OK	MENT:					
NOTE: REPORT MATERIAL	THRUPUT IN THE UNI	TS SPECIFIED	IN THE	INSTRUCTION B	OOKLET, TABLE	v.

EQP5609 (REV 10/95)

Attachment F August 1996 Precipitator Log

PRECIPITATOR LOG

DATE	TIME		CTION	4		CTION AMPS	A	C SEC		A/	DEMARKS
DATE			,		365	26	f	310		<u>/M</u> ₁ ·	REMARKS
3-2-96	0123	290	6	A			71	0/0	2/	4	100/185
8-2-96	1550	270	0	#	300	17	#	320	27	#	100/100
8-2-96	1900	290.	Ô	Д	300	16	A	320	27	A	100-(8)
8-3-16	0659	270	0	H	295	15	$\mathcal{L}^{!}$	325	27	#	100-100
8-3-96	1549	290	ව	A	280	[[A	330	26	15	104/100
7-496	2330	250	0	A	300	15-	A	340	28	A	100/100
8-4-96	0107	280	6	4	290	12	A	330	24	A	108/100
8496	1600	270	\mathcal{D}	#	M	19	17	320	25	<i>A</i>	100/100
8-5-96	2300	290	0	A	300	12	A	320	28	12	10/100
2/5/96	0646	280	0	A	260	12	A	320	25	A-	100/100
8-5-96	1600	260	2	Ą	260	15	N	301	re	A	100/100
8-5-96	2340	245	0	1	300	21	1	370	77	, 4	100/100
8-6-96	0630	250	0	1	260	15	1	32	76	4	lou / 100
8-6-96	1935	250	10	A	300	20	Ĥ-	320	21	1	100/100
8-7-96	1905	240	[O"	A	305	20	4	300	26	4	100/100
6746	2326	270	0	1	3/0	21	A	320	77.	4	100/100
8-896	17630	150	10	A	290	M	A	300	76	1	100/100
6-8-96	2310	270	10	A		25	IT		27	A	100/10
100	0677	270	//	74	9/0	2/	A	320	L	A	100/100
8-5-96	15/5	250	\mathcal{D}	A	300	15	A	-310	17	12	10/100
8-9-96	1940	270	0	4	300	20	A	315	27	A	100 - 100
8-10-96	0648	250	10	A	300	20	ثم	310	17	14	po/100



POWER 6 REVISED: MAY 15, 1995

PRECIPITATOR LOG

DATE	TIME		CTION AMPS	A		CTION		C SEC		A/	DEMARKS
DATE	HIME	VOLIS	VIAILO	\ IM	VOLIS	AWIFS	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	VOLIS	MINITO	M	REMARKS
6-10-46	2225	260	410	A	265	15	B	320	22	14.	100/100
94.76	0645	470	1.12	14	100	<i>Zo</i>	4	520	22	1	120/4
8-11-96	1515	250	0	A	300	15	A	320	22	12	100/100
8.11-96	2115	250	0	14	300	17	4	3 20	27	4	100-100
8-12-46	0738	745	0	1	305	15	A	315	227	À	rogras
8-17-96	160	750	40		300	11	1	320	Zlo	A	100/100
8-13-96	2300	780	10	A	300	_	4	320		A	100/100
8-13-96	0652	270	14	A	<i>35</i> 0	25	1	30	27	4	100-190
8-13-96	1456	260	13	1	370	35	A	315	78	1	100 Mas
8-14-96	0111	260	0	1	330	35	4	315	28	A	100/100
8-14-96	2200	250	210	A	3 <i>0</i> 0	22	<i>A</i> ,	310	23	ŋ	100/100
G1-86	00%	26	<i>J</i>	A	30		A	20	27	A	137-11
8-15-96	1447	230	0	A	290	14	A	320	28	A	100/100
9/15/	4824	70	(7)		790	18	A	310	27	VA	where
g-16-46	0100	260	10	A	30O	20	15	320	27	A	1
816-96	1600	250	410	17	300	25	A	315	27	A	100/100
8-16-96	2307)	270	10	A.	300	21	Ŋ	720	26	V	100/100
8-17-91	0635	280	14	A	315	33	A	315	27	A	100-100
2/17/94	1850	240	12	ستبعم	310	78	سلتم	315	28	<u>a</u>	pcc 100
6-18-46	0700	280	10	n	330	35	7	315	27	A	100/10
8-18-96	1300	780	12	V	320	30	A	315	27	A	10/wo
8/12/20	0630	250	13	A	330	39	Ą	370	27	A	100/100

POWER 6 REVISED: MAY 15, 1995

PRECIPITATOR LOG

DATE	Ther		CTION	4		CTION	A/	C SEC		4	
	TIME	VOLTS				AMPS	<u>/M</u>	VOLTS		M	REMARKS
E/19/91	1430	250	0	A	3/0	30	A	320	20	A	
8-19-96	1930	240	0_	17	300	20	A	320	27	4	A-4/5 100-100
8/20/96	3635	240	0	A	300	20	14	315	27	12	taction
8/20/96	1500	240	Ò	A	300	18	#	5/0	ى	7	100/100
8-20-96	23/5	240	0	A	260	12	m	320	28	A	100/100
811:196	0 30	240	0	4	300	13	A	330	7.7	<u>}</u>	100/100
8/21/96	1500	230	0	A	270	12	A	320	28	升	100/100
6-21-96	2241	230	6	A	40	13	Д	330	27	A	100/100
8-22-96	0645	750	14	4	300	7 <i>0</i>	A	320	28	A	100/100
8-12-96	1570	250	10	A	300	15	A	320	22	A	100 12
4-2276	1823	000	2	Д	290	11	A	330	27	1.7	100/100
2/73/96	0649	230	0	A	290	12	B	320	20	A	100/100
6-23-96	1500	770	216	ैं। 745	3 %	15	,	32s	- Section		enller.
8/23/96	1907	250	0	A	290	12	A	₹ 0	20	1	100/1cc
8-23-96	2248	245	0	A	Z75	13	A	336	7 0	1	100/100
8-24-96	0630	250	210	1	300	12	1	32	25	1	105/10
8-24-96	1923	190	04	А	260	10	A	320	17	1	poloc
8/25/50	0750	245	Ô	A	300	13	A	320	20	17	
87546	1530	150	0	1	280	10	Λ	32	24	A	100/00
4-2541	2247	196	5	A	180	15	A	325	27	4	100/100
8-25-96	0645	260	0	iA	To	25	14	315	27	14	100-100
8-25-96	1545	230	0	A	200	17	A	320	27	44	100/111

POWER 6 REVISED: MAY 15, 1995

Attachment G Sulfur Sample Results - May 1996

REAM & HAAGER LABORATORIES

P.O. BOX 746 1226 KADERLY STREET NW NEW PHILADELPHIA, OHIO 44663-1297 (216) 343-3711 FAX (216) 343-9858

May 10, 1996

LABORATORYNO: 246484

DATE RECEIVED: 5/9/96

ANALYSIS OF: COAL - 6 BAG COMP - 5/1, 5/2, 5/3, 5/4, 5/6, & 5/7/96

RECEIVED FROM: E.B. EDDY PAPER INC

POWER PLANT-DOCK E, 1705 WASHINGTON AVE

PORT HURON, MI 48060

REPORTED TO: MR. RANDY MCNEALY

	AS RECEIVED	DRY	AS	TM METHOD
MOISTURE	5.98%		(D-	2961, D-3173)
ASH	8.13%	8.65%	6	(D-3174)
VOLATILE MATTER				(D-3175)
FIXED CARBON				(D-3174)
SULFUR	0.87%	0.92%	%	(D-4239)
HEAT CONTENT	12,947 BTU/lb	13,771 E	3TU/lb	(D-1989)
MAF		15,075	BTU/lb	
ASH FUSION DATA (D-1857) INITIAL DEFORMATION SOFTENING (H=W) SOFTENING (H=1/2W)	2579 Deg.F 2642 Deg.F 2762 Deg.F	RESIDUAL MOISTURE	2.65% RE <u>%</u>	(D-3173) (D-1412)
FLUID TEMPERATURE	2800 Deg. F	FREE SWELLING INDEX		(D-0720)
		GRINDABILITY INDEX	HGI-38	(D-0409)
. ^	^	FERRIC OXIDE (Fe ₂ O ₃)	%	(D-3682)
ANALYZED BY: VIBHA ACHARY	Acharya A, CHEMIST	CHLORINE	%	(D-4208)

Maximum potential (SO2) in stack gas =1.27 lbs / megBTU

^{*} Confidential Information for E.B. EDDY PAPER INC and cannot be duplicated without company consent.

REAM & HAAGER LABORATORIES

P.O. BOX 746 1226 KADERLY STREET NW NEW PHILADELPHIA, OHIO 44663-1297 (216) 343-3711 FAX (216) 343-9858

June 3, 1996

LABORATORY NO: 246806

DATE RECEIVED: 5/24/96

ANALYSIS OF:

COAL - 8 BAG COMP-5/8, 5/9, 5/10, 5/16, 5/17, 5/18, 5/20, & 5/21/96

RECEIVED FROM: E.B. EDDY PAPER INC

POWER PLANT-DOCK E, 1705 WASHINGTON AVE

PORT HURON, MI 48060

REPORTED TO:

MR, RANDY MCNEALY

	AS RECEIVED	DRY	AS	TM METHOD
MOISTURE	9.68%		(D-	2961, D-3173)
ASH	8.23%	9.11%		(D-3174)
VOLATILE MATTER	1			(D-3175)
FIXED CARBON				(D-3174)
SULFUR	0.98%	1.09%		(D-4239)
HEAT CONTENT	12,274 BTU/lb	13,590 BTU/lb)	(D-1989)
MAF		14,952 BTU/II	b	
ASH FUSION DATA (D-1857) INITIAL DEFORMATION SOFTENING (H=W) SOFTENING (H=1/2W)	2384 Deg. F	RESIDUAL MOISTURE 2.6 EQUILIBRIUM MOISTURE %	<u>57%</u>	(D-3173) (D-1412)
FLUID TEMPERATURE	2482 Deg. F	FREE SWELLING INDEX		(D-0720)
		GRINDABILITY INDEX		(D-0409)
\mathcal{N}	ħ.	FERRIC OXIDE (Fe ₂ O ₃)	%	(D-3682)
ANALYZED BY: VIBHA ACHARY	A. CHEMIST	CHLORINE	%	(D-4208)

Maximum potential (SO2) in stack gas =1.52 lbs / megBTU

^{*} Confidential information for E.B. EDDY PAPER INC and cannot be duplicated without company consent.

REAM & HAAGER LABORATORIES

P.O. BOX 746 1226 KADERLY STREET NW NEW PHILADELPHIA, OHIO 44663-1297 (216) 343-3711 FAX (216) 343-9858

June 4, 1996

LABORATORY NO:

246943

DATE RECEIVED:

6/3/96

ANALYSIS OF:

COAL - 6 BAG COMP-5/22, 5/23, 5/24, 5/25, 5/26, 5/29/96

RECEIVED FROM: E.B. EDDY PAPER INC

POWER PLANT-DOCK E. 1705 WASHINGTON AVE

PORT HURON, MI 48060

REPORTED TO:

MR. RANDY MCNEALY

	AS RECEIVED	DRY AST	M METHOD
MOISTURE	7.87%	(D-2	961, D-3173)
ASH	7.03%	7.63%	(D-3174)
VOLATILE MATTER			(D-3175)
FIXED CARBON			(D-3174)
SULFUR	0.99%	1.08%	(D-4239)
HEAT CONTENT	12,693 BTU/ib	13,777 BTU/lb	(D-1989)
MAF		14,915 BTU/lb	
ASH FUSION DATA (D-1857) INITIAL DEFORMATION SOFTENING (H=W) SOFTENING (H=1/2W)	2405 Deg.F 2447 Deg.F 2510 Deg.F	····	(D-3173)
FLUID TEMPERATURE	2711 Deg. F	EQUILIBRIUM MOISTURE %	(D-1412)
		FREE SWELLING INDEX	(D-0720)
		GRINDABILITY INDEX	(D-0409)
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	1	FERRIC OXIDE (Fe ₂ O ₃) %	(D-3682)
ANALYZED BY: VIBHA ACHARY	charya A, CHEMIST	CHLORINE %	(D-4208)

Maximum potential (SO2) in stack gas =1.49 lbs / megBTU

^{*} Confidential information for E.B. EDDY PAPER INC and cannot be duplicated without company consent.

Exhibit H

July 1996 Volatile Organic Compounds Emission Report from Paper Machine #8



E. B. EDDY PAPER, INC.

Phone: (810) 982-0191 Fax: (810) 982-7124 1700 Washington Ave. P.O. Box 5003 Port Huron, Michigan 48061-5003

August 14, 1996

Mr. Fred Rieth
District Supervisor of Air Quality
Michigan Department of Environmental Quality
38980 Seven Mile Road
Livonia, MI 48152

Dear Mr. Rieth:

Enclosed please find our monthly report of VOC emissions, as required by our Air Quality Permit No. 690-88. This report is for the month of July, 1996.

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Christine J. Lupu

Environmental Engineer

CJL: jbz.

cc: S. J. Bentley

Attachment

AIR QUALITY PERMIT NO. 690-88

MONTHLY REPORT FOR JULY 1996

E. B. EDDY PAPER, INC. 1700 WASHINGTON AVENUE P. O. BOX 5003 PORT HURON, MI 48061-5003

NUMBER 8 PAPER MACHINE

VOC EMISSIONS MONTHLY VOC TOTAL

	(TONS)	
1	1.53	JULY 1996
2	1.88	JUNE 1996
3	1.50	MAY 1996
4	1.63	APRIL 1996
5	1.99	MARCH 1996
6	1.37	FEBRUARY 1996
7	1.40	JANUARY 1996
8	1.19	DECEMBER 1995
9	1.06	NOVEMBER 1995
10	1.41	OCTOBER 1995
11	1.42	SEPTEMBER 1995
12	1.74	AUGUST 1995
	and the state of t	
TOTAL	18.12	

12 Month Rolling Average (Tons): 1.51 Air Use Permit Limit is 26.2 tons of V.O.C. per 12 months.

Christine J. Lupu

Environmental Engineer

Attachment H

July 1996 Volatile Organic Compounds Emission Report from Paper Machine #8

Attachment I

Summary Report April - June 1996 for Coal Boiler (#5)



complete.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

AIR QUALITY DIVISION

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

ompany: E.S. Eddy Paper, Inc. Unit Description: #5 mission Limit: Hin Not Greater Han 2000 onitor manufacturer, model no. & serial no.: Lear Sieger 1100 M	Boiler 31,040 41,
EMISSION DATA SUMMARY	
1. Duration of excess emissions (EE) in reporting period due to:	
a. Startup/Shutdown	162
b. Soot Blowing	66
c. Control Equipment Problems	0
d. Process Problems	6
e. Other Known Causes	6
f. Unknown Causes	<i>O</i>
2. Total duration of EE	1240
3. <u>Total duration of EE</u> x 100 Total source operating time	0.18%
CEM SYSTEM SUMMARY	
1. CEM system downtime in reporting period due to:	
a. Monitor Equipment Malfunction	305
b. Non-Monitor Equipment Malfunctions	0
c_ Quality Assurance Calibration	360
d. Other Known Causes	0
e. Unknown Causes	1 0
2. Total CEM system downtime	665
3. <u>Total CEM system downtime</u> x 100 Total source operating time	0.51%
For opacity, record time in minutes. For gases, record time in h	ours

______ Date: 7 / //4

Excess Emission Report

OPACITY

April-June 1996

Date	Magnit	ude	Time-Du	ration			Cause
Occurred	Ave	Max	Start	Stop	Cause	Corrective Action	Code
4/9/96	22	22	17:45	17:51	Soot Blowing		В
4/14/96	30	30	3;27	3:33	Soot Blowing		В
4/17/96	26	26	3:04	3:10	Soot Blowing	***************************************	B
4/20/96	23	23	4:46	4:52	Soot Blowing	*	В
4/27/96	24	24	11:16	11:22	Soot Blowing		В
							_
5/2/96	23				Soot Blowing	***************************************	В
5/4/96	22			4:35	Soot Blowing	,	В
5/11/96	37	68	6:35	7:29	Rappers Off	Boiler Shutdown	Α
	22	22	7:53	7:59	Rappers Off	Boiler Shutdown	Α
	24	26	10:05	10:17	Rappers Off	Boiler Shutdown	Α
	46	57	10:47	11:17	Rappers Off	Boiler Shutdown	Α
	25	25	13:35	13:41	Rappers Off	Boiler Shutdown	Α
5/13/96	24	24	11:12	11:18	Sand Blasting	Boiler Shutdown	Α
	28	28	11:36	11:42	Sand Blasting	Boiler Shutdown	Α
	25	29	11:54	12:18	Sand Blasting	Boiler Shutdown	Α
	24	24	12:42	12:48	Sand Blasting	Boiler Shutdown	Α
5/17/96	31	34	0:09	0:21	Startup Fan	Boiler Startup	Α
6/22/96	37	37	17:06	17:12	Soot Blowing		В
6/24/96	24	24	5:24		Coal Pluggage	Manually Rodded Piping	E
	32	43			Soot Blowing		В
6/26/96					Soot Blowing		В
6/29/96					Coal Pluggage	Manually Rodded Pluggage	D

CAUSE CODE

A. Startup/Shutdown E. Other

B. Soot Blowing

F. Unknown

C. ESP Problems

D. Boiler Problems

MONITORING SYSTEM INOPERATIVE

April-June 1996

Date Occurred	Parameter Affected	Time-Duration Start Stop	Cause	Corrective Action	Cause Code
5/14/96	Opacity	6:00 12:0	00 Calibration		С
5/28/96	Opacity	4:35 9:4	0 Unit Shorting Out	Replaced Power Supply	Α

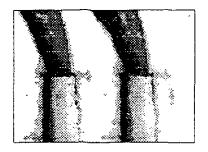
CAUSE CODE

- A. Monitor equipment malfunction
- B. Non-monitor equip. malfunction
- C. Quality assurance Calibration
- D. Other known causes
- E. Unknown causes

CERTIFICATION AUDIT

40CFR60, APP. B, PS1
CONTINUOUS OPACITY
MONITORING SYSTEM (COMS)

E.B. Eddy, Inc. Boiler #5 1100M 1142



15-May-96

PREPARED FOR:

E.B. Eddy, Inc. Boiler #5 Port Huron, Michigan

TABLE OF CONTENTS

INTRODUCTION
TEST PROCEDURES
RESULTS
CALIBRATION FILTER SELECTION2
RESPONSE TIME DETERMINATION
CALIBRATION ERROR DETERMINATION4
FIELD TEST DATAAPPENDIX A

INTRODUCTION

Monitor Labs, Inc. was contracted to conduct a performance evaluation in accordance with USEPA 40CFR60, App. B, PS 1 on the opacity monitoring system located at the site stated below. All results are within specification.

Customer name	E.B. Eddy, Inc.		
Monitor Location	Boiler #5		
Facility Location (city,state)	Port Huron, Michigan		
Instrument Manufacturer	Monitor Labs, Inc.		
Instrument Model #	1100M		
Instrument Serial #	1142		
Today's Date (mo/dd/yr)	5/15/96		
Monitoring Pathlength (in meters)(0.305m=1ft)	1.509		
Emission Outlet Pathlength (in meters)	1.509		
Flange to Flange Distance (in meters)	1.766		
OPLR	0.500		
Instrument Span (%)	100		
Person Conducting Test	A. Kumm		
Date of Cal Error Testing (mo/dd/yr)	5/14/96		
Low Neutral Density Filter Value	0.1228	Tool No.	1011
Mid Neutral Density Filter Value	0,4137	Tool No.	1012
High Neutral Density Filter Value	0.6982	Tool No.	1013

TEST PROCEDURES

Calibration Error Test

The Calibration Error Test was performed IAW paragraph 7.1.4 of the 40CFR60, App B, PS1. Low, mid, and high range filters certifiable to the National Institute of Standards and Testing were used. Fifteen non-consecutive tests were completed using the three filters (five readings with each filter). The calibration error is represented by the sum of the mean differences plus 95 percent confidence interval expressed as a percentage of the known filter value.

Response Time Test

The response Time Test was performed IAW paragraph 7.1.5 of 40CFR60, App B, PS1. The high range calibration filter is inserted into the light path five times. The upscale response time is the time it takes the system to respond to 95% of the filter value when the filter is inserted into the light path. The downscale response time is the time it takes the system to respond to 5% of the filter value when the filter is removed from the light path.

RESULTS

Test	Specification	Actual	
Calibration Error (%)	≤3%	0.51 Low	
		0.57 Mid	
		1.04 High	
Response Time (seconds)	< 10 seconds	6.60 Average	

CALIBRATION FILTER SELECTION

Nominal attenuator optical density based upon instrument span:

(Table 1-2 of 40CFR60, App. B, PS 1)

Span %	Calibrated Attenuator Optical Density/Opacity									
	Low-range		Mid-range		High-range					
40	0.05	11	0.1	20	0.2	37				
50	0.1	20	0.2	37	0.3	50				
60	0.1	20	0.2	37	0.3	50				
70	0.1	20	0.3	50	0.4	60				
80	0.1	20	0.3	50	0.6	75				
90	0.1	20	0.4	60	0.7	80				
100	0.1	20	0.4	60	0.9	87.5				

Optical Density Opacity % Low 0.1 20 Mid 0.4 60 High 0.9 87.5

Desired optical density:

Based upon nominal value x (Monitor Pathlength/Emission Outlet Pathlength -or- 1/(2*OPLR))*

Optical Density Opacity %**
Low 0.100 20.57
Mid 0.400 60.19
High 0.900 87.41

Actual filter values:

(Actual Filters are chosen from filters with OD values closest to either nominal values or desired values.)

Optica	d Density	Opacity %**	Tool No.
Low	0.1228	24.63	1011
Mid	0.4137	61.43	1012
High	0.6982	79.96	1013

^{*}IAW 40CFR60, App. B, PS1, 7.1.2, eq. 1-1

^{**}Opacity % = 100*(1-10^(-2*OD_of_Filter*OPLR)), IAW Opacity Monitor Instruction Manual

RESPONSE TIME DETERMINATION

Person Conducting Test	A. Kumm	Analyzer Manufacturer	Monitor Labs, 1	lnc.
Affiliation	Monitor Labs, Inc.	Model Serial No.	1100M	1142
Date	14-May-96	Location	Port Huron, Mi	chigan
High Range Calibration F	ilter Value:	Desired Optical Density (Path Adjusted Optical De	•	(87.50) (79.96)
Upscale Response Value (Downscale Response Valu			nt opacity nt opacity	
	Upscale	1 5.00 seconds 2 6.00 seconds 3 3.00 seconds 4 5.00 seconds 5 6.00 seconds		
	Downscale Average Resp	1 9.00 seconds 2 8.00 seconds 3 7.00 seconds 4 9.00 seconds 5 8.00 seconds bonse 6.60 seconds		

CALIBRATION ERROR DETERMINATION

Person Conducting Test Affiliation Date	A. Kumm Monitor Labs, Inc. 5/14/96		Analyzer Manufacturer Model/Serial No. Location	Monitor Labs, Inc 1100M / Port Huron, Michi	1142
Monitoring System Outpu		d? Yes	x No OPLR	= 0.500	
Calibrated Neutral Densit	y riner values				
Desired Optical D	ensity (Opacity):		Path Adjusted Optic	al Density (Opacity):	
					Tool No.
Low-Range	0.10 (20.	00)	Low-Range	0.1228 (2	4.63
Mid-Range	0.40 (60.	00)	Mid-Range	0.4137 (6	1.43) 1011
High-Range	0.90 (87.	50)	High-Range	0.6982 (7	9.96) 101:

Run Number	Calibration Filt (Path-Adjusted Perc		Instrument Reading (Opacity), percent	Arithmetic Difference (Opacity), percent			
					Low	Mid	High
1-Low	24.63		24.50		0.13	Q20: 14:11:11:11:11:11:11:11	777
2-Mid	61.43		62.00			0.57	
3-High	79.96		81.00			ygyvacalaralya y	1.04
4-Low	24.63		24.50		0.13		
5-Mid	61.43		62.00			0.57	
6-High	79.96		81.00				1.04
7-Low	24.63		24.00		0.63		
8-Mid	61,43		62.00		全国政治人物 等	0.57	
9-High	79.96	,,,,,,,	81.00				1.04
10-Low	24.63		24.50		0.13		0445045
11-Mid	61.43		62.00		the real pay feeting to	0.57	
12-High	79.96		81.00		5-0-0-3-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-		1.04
13-Low	24.63		24.50		0.13		
14-Mid	61.43		62.00		The second secon	0.57	
15-High	79.96		81.00				1.04

Remarks:	(1) Calibration Error	Arithmetic N	Mean (Equation 1-3)	x	0.23	0.57	1.04
	<= 3% Opacity.	Standard De	viation (Equation 1-4)	Sđ	0.22	0.00	0.00
	• •		Coefficient (Equation 1-5)	cc	0.28	0.00	0.00
			Error % (Equation 1-6)	Er	0.51	0.57	1.04

APPENDIX A FIELD TEST DATA

Attachment J NPDES Discharge Monitoring Requirements - 8/27/96



E. B. EDDY PAPER, INC.

Phone: (810) 982-0191 Fax: (810) 982-7124 1700 Washington Ave. P.O. Box 5003 Port Huron, Michigan 48061-5003

August 27, 1996

Ms. Patricia Brandt, PCS Coordinator MDEQ- Surface Water Quality Division P.O. Box 30273 Lansing MI 48909-7773

Dear Ms. Brandt:

Enclosed you will find a revision of the E.B. Eddy Paper, Inc. NPDES Discharge Monitoring Report (DMR) for July 1996. We discovered an error in our calculation this month for report of Dechlorination Reagent used. Therefore we are submitting the revised DMRs and daily monitoring report at this time.

The information revised includes:

Outfall 008A: Dechlorination Reagent used Outfall 009A: Dechlorination Reagent used

Please do not hesitate to call me if there are any problems.

Sincerely,

Christine J. Lupu

Environmental Engineer

cc: S.

S. Bentley

'ERMITTEE NAME ADDRESS (Include 'acility Name/Location if different)	<u> Inc</u>		DISCHA	ARGE MO (2-16)		(17-19)	atsall 00	8 to B	lack	River	
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FROM	96	07	01	τO	96	07	31	

PERMITTEE NAME/ADDRESS (Include Facility
Name/Location if different)
NAME E. B. Eddy Paper, Inc.
ADDRESS 1700 Washington Ave.
Port Huron, MI 48060

FACILITY

OCATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPHISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes gray include lines up to \$10,000 and or maximum imprisonment of between 6 months and 5 version.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

CARISTINE J. LUPU,

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TYPED OR PRINTED

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10ME E. B. Eddy Paper, Inc. 1700 Washington Ave. DDRESS Port Huron, MI 48060 NAME/TITLE PRINCIPAL EXECUTIVE OFFICER Christine J. Lupu SIGNATURE OF PRINCIPAL EXECUTIVE ACILITY Environmental OFFICER OR AUTHORIZED AGENT TYPED OR PRINTED OCATION --- OUTFALL 009A (2 OF 2) --80092 1 0 0 01042 1 0 1 01027 1 0 1 61406 R 0 0 PAR #: COPPER, TOTAL CADMIUM, TOTAL TOXICITY DECHLOR, REAGENT PARAMETER: 1.0 DAILY MAX REPORT REPORT REPORT LIMIT: LBS/DAY T.U. ug/L ug/L UNITS: 330.5 1 DATE: 330.5 0 43 2 231.4 3 330.5 4 265.8 5 247.8 6 247.8 7 247.8 8 562.9 0 9 39 595.1 10 606.8 11 608.4 12 656.6 13 606.5 14 578.1 15 0.00 539.8 16 0 569.5 140 17 516.2 18 490.2 19

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Attachment k NPDES Discharge Monitoring Requirements - Operation Logs

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NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(2-16) (17-19)

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

人名英格兰人姓氏 经收益 经收益

Form Approved.

Approval expires 05-31-98

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PERMITTEE NAME/ADDRESS (Include Facility NAME	Name/Location if Differen	i)	DISCH	LUTANT DISCH IARGE MOI (2-16)	NITORING REPORT		CHALL TO		OMB N	Approved. No. 2040-0	
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NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) Form Approved. PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different) DISCHARGE MONITORING REPORT (DMR) MENT OF THE THE STAS DMB No. 2040-0004 The state of the s Approval expires 05-31-98 ADDRESS FOR HILL HILL TO BE 化二硫二苯丁烷基胍 (4) (4) (4) (4) (4) PERMIT NUMBER DISCHARGE NUMBER 21 II MONITORING PERIOD FACILITY YEAR MO DAY YEAR MO DAY 343 JO 7131 HE HE Sere Vi LOCATION (4) Telephone (in) FROM TO N 1 1 1 1 19 10 E 40 P 4 NOTE: Read instructions before completing this form. (20-21) (22-23) (24-25) (26-27) (28-29) (30-31) (4 Card Only) QUANTITY OR CONCENTRATION QUANTITY OR LOADING (3 Card Only) FREQUENCY NO. SAMPLE **PARAMETER** (54-61) (46-53) (54-61) (38-45) (46-53) OF EΧ TYPE (32-37) ANALYSIS **AVERAGE MAXIMUM** UNITS MINIMUM **AVERAGE** MUMIXAM UNITS (62-63) (64-68)(69-70)SAMPLE A 1 1 1 2 1 15 MEASUREMENT મુંદ્ર કર દેશ ATTY PERMIT 18 × 50 · 1 REQUIREMENT 36601841 第五十世子 科莱 SAMPLE . 34 MEASUREMENT $\{q_1,\dots,q_n\}$ 和教教育化學 PERMIT શે જે કરે છે. REQUIREMENT The A SAL BATER MY SAMPLE MEASUREMENT 16 6 6 Q 40 3 - 12 50 50 ा अभिदिस्ता PERMIT REQUIREMENT TAILY MY St 12 2 1 14 30000103数 SAMPLE MEASUREMENT हिन्दुहुर हा रह 178 87 11 化酶间移移物 PERMIT 14 12 51 52 REQUIREMENT 粉点装件单 网络 SAMPLE 101/6 MEASUREMENT 10 61

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NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED

- j γ

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AVARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 1B U.S.C. \$ 1001 AND \$3 U.S.C. \$ 1319. (Penalties under these statutes may include fines up to \$10,000 and or maximum imprisonment of between 6 months and 6 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE

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TELEPHONE DATE

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COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

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DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER 008 A DISCHARGE NUMBER

İ	MONITORING PERIOD									
	YEAR	MO	DAY		YEAR	МО	DAY			
FROM	96	07	01	το	96	07	3/			

ERMITTEE NAME/ADDRESS (Include Facility

|ame/Location if different)
AME E. B. Eddy Paper, Inc.

DDRESS 1700 Washington Ave.

Port Huron, MI 48060

ACILITY

CATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENAL TIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of Detween 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Stephen J. Bentley
Technical Director
TYPED OR PRINTED

	OUTFA	LL 008A (1 OF 2)			50060 1 0 1
PAR #:	84130 1 0 0	00400 1 0 0	50060 1 0 0	00530 1 1 0	TRC
PARAMETER:	VISUAL	pН	FLOW	TSS	36 DAILY MAX
	REPORT	6.5 - 9.0	REPORT	435 (MAY-OCT)	UG/L
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DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160
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	YEAR	MO	DAY	- 	YEAR	мо	DAY			
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Port Huron, MI 48060	(Penalties under Delween 6 mon
ACILITY	SIGNATURE OFFICER

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSEINFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include lines up to \$10.000 and or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER ON AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Stephen J. Bentley
Technical Director
TYPED OR PRINTED

			TFALL 008A (2 (OF 2)	
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MICHOLINA DEPARTMENT OF NATURAL RESOURCES

DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER

AP00 DISCHARGE NUMBER

MONITORING PERIOD мо DAY MO DAY τo 96 07 01 31

'ERMITTEE NAME/ADDRESS (Include Facility

lame/Location if different)
AME E. B. Eddy Paper, Inc.

AME

Port Huron, MI 48060

ACILITY OCATION

DDRESS 1700 Washington Ave.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

between 6 months and 5 years.)

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of the provide and 5 unarts.) NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Stephen J. Bentley Technical Director TYPED OR PRINTED

	_		OUTFALL 009A	(1 OF 2)			
PAR #: PARAME LIMIT: UNITS:	TER:	84130 1 0 0 VISUAL REPORT L=YES 0=NO	00400 I 0 0 pH 6.0 - 9.0 S.U.	50050 1 0 0 FLOW REPORT MGD	00665 1 0 0 TOTAL P 1.0 MONTH AVE MG/L	00665 I 0 0 TOTAL P 67 MONTH AVE LBS/DAY	50060 1 0 0 TRC 0.75 DAILY MAX MG/L
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	3	i	7.2	5.44			0.00
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	10	1	7.3	5.41			0.00
	11	1	7.1	5.04			0.00
	12	1	7.2	5.29			0.00
	13	1	7.1	5.09			0.00
	14	1	7.1	4.70			0.00
	15	1	7.2	5.46			0.00
	16	1	7.3	5.73			0.00
	17	1	7.4	5.73	0.29	14	0.00
	18	1	7.4	5.64			0.00
	19	1	7.5	5.92	•		0.00
	20	I	7.5	5.52		•	0.00
	21	I	7.4	5.38			0.00
	22	1	7.5	4.84			0.00
	23	1	7.5	5.00	0.24	10	0.00
	24	1	7.4	5.56			0.00
	25	1	7.4	5.48			0.00
	26	1	7.4	5.52			0.00
	27	1	7.2	5.72			0.00
	28	1	7.2	5.13			0.00
	29	1	7.2	5.70			0.00
	30	1	7.1	5.73	0,21	10	0.00
	31	1	7.0	5.74	•		0.00
AVERAG	iE:	1	7.3	5.37	0.29	14	0.00
TOTAL:		31	225.7	166.54	1.47	69	0.00
MINIMU	M:	1	7.0	4.70	0.07	3	0.00
MAXIMU	M: ·	1	7.5	5.92	0.66	32	0.00

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER

DISCHARGE NUMBER

		M	ONITOF	RING F	PERIOD		
	YEAR	MO	DAY	-	YEAR	МО	DAY
FROM	96	07	01	το	96	07	3/_

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE: I AM AWARD THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319.

(Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of between 6 months and 5 years.)

CILITY

OCATION:

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED THE INFORMATION SUBMITTED THE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319.

(Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of between 6 months and 5 years.)

STEPHEN J. BENTLEY

SIGNATURE OF PRINCIPAL EXECUTIVE TECHNICAL DIRECTOR

TYPED OR PRINTED

		ОГЛТ	ALL 009A (2 OF 2) -	_ _
PAR #: PARAMETER: LIMIT: UNITS:	01042 1 0 1 COPPER, TOTAL REPORT ug/L	01027 I 0 I	61406 R 0 0 TOXICITY 1.0 DAILY MAX T.U.	80092 1 0 0 DECHLOR, REAGENT REPORT LBS/DAY
D 4 0000	ı			105.7
DATE:	2			105.7
	3			74.0
	4			105.7
	5			85.0
	6			79.2
	7			79.2
	8		•	79.2
	9			180.0 190.2
	10			190.2
	11			194.0 194.5
	12			194.3 209.9
	13			193.9
	14			184.8
	15		0.00	
	16		0.00	182.1
	17			165.0
	18			156.7
	19		•	203.1
	20			208.6
	21			209.5
	22			213.1
	23	3 0		222.9
	24			164.7
	25			176,8
	26			180.3
	27			177.4
	28			170.7
	29		,11	170.7
	30		•••	175.1
	31			
45 FFD 4 CF7-		3 0	0.0	
AVERAGE:		3 0	0.0	
TOTAL: MINIMUM:		3 0	0,0	
		3 0	0.0	0 222.9
MAXIMUM:		-		

2.000

DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER 009B DISCHARGE NUMBER

	MONITORING PERIOD									
_	YEAR	мо	DAY		YEAR	мо	DAY			
FROM	96	07	01	10	96	07	31			

NOITADC

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY NOUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Stephen J. Bentley
Technical Director
TYPED OR PRINTED

			OUT	FALL 009B (I O	F 1)
PAR#:		50050 P 0 0	00310 Q 0 0	00530 Q 0 0	00145 P 0 0
PARAMETER:		FLOW	BOD, 5-DAY	TSS	TOTAL
LIMIT:		REPORT	6954	6207	PRODUCTION
UNITS:		MGD	LBS/DAY	LBS/DAY	TPD
DATE:		3.77	1195	189	337.8
	2	3.37	984	157	310,1
	3	3.29	960	263	279.0
	4	4.10	1200	219	290.8
	5	3.90	1324	. 247	321.9
	6	4.01	2184	254	279.3
	7	4.21	1685	393	351.1
	8	3,66	1190	342	343.9
	9	3,86	2608	348	329.3
	10	3,50	919	298	225.5
	11	3.16	509	169	253.2
	12	4.01	1635	241	301.5
	13	4.07	1633	278	351.
	14	3.55	1169	. 308	353.0
	15	3.60	621	324	303.2
	16	3.87	1843	3641	300.0
	17	3.88	1773	-246	307.1
	18	4.48	1659	224	285.1
	19	4.09	1003	450	275.3
	20	3.84	1419	263	275.:
	21	3.73	915	137	373.3
	22	3.60	1877	276	352.9
	23	3.55	1504	261	333.1
	24	3.79	1821	2187	323,
	25	3.81	1080	197	309.0
	26	4.42	704	251	295.4
	27	4.08	2215	231	282,9
	28	3.83	.1. 808	268	320.5
	29	3.80	1623	532	285.6
	30	3.68	994	196	284,8
	31	3,65	910	524	253.4
AVERAGE:		3.81	1354	449	SEE ATTACHED
TOTAL:		118,16	41965	13915	9491.6
MINIMUM:		3.16	509	137	225,5

TANK OLIVER OF WATORIAL RESOURCES

DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER

OO9 B

		M	ONITOR	IING F	PERIOD		i
	YEAR	МО	DAY		YEAR	МО	DAY
FROM	96	07	01	TO	96	07	3/

ERMITTEE NAME/ADDRESS (Include Facility
ame/Location if different)
AME E. B. Eddy Paper, Inc.
DORESS 1700 Washington Ave.
Port Huron, MI 48060

ACILITY
DOCATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of between, 6 months and 5 years.)

* TOTAL

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Stephen J. Bentley
Technical Director
TYPED OR PRINTED

Jul-		NO. S	DM		NO. 6	PM	•	NO. 7	PM	•	140. 6			
Jui-	90	TPD	HRS		TPD	HRS	*	TPD	HRS	٠	TPD	HRS	*	TPD
		IPD	11100				•			•			•	
	1	43.32	22.97		61.93	22.42		113.24	20.11	•	119.27	23.82	*	337.75
	2	8.44			67.87		•	106.50	22.55	•	127.32	23.35	•	310.12
	3	40.59			55.87		•	59.68	17.85	•	123.41	23.57	*	279.55
	4	39,26			64,21	24.00	*	75.26	22.90	*	112.05	22.98	•	290.79
	5	38.29			68.03	23.43	•	71.39	22.47	•	144.21		•	321.91
	6	36.49			70.31	23.38	•	89.05	23.30	•	81.85		*	279.71
	7	39.97		•	58.49	23.01	•	106.63	22.59	•	146.05		٠	351.13
	6	37.89		•	47.12	20.42	•	126.27	23.04	•	132.58	21.82	*	343.87
	9	39.41			56.83	24.00	•	86.61	17.51	*	146.89		*	329.74
	10	40.09		•	59.57	23.67	•	37.66	8.25	*	68.21		•	225.54
	11	36.97		*	73.20	23.58	*	106.01	23.34	•	35.06	7.63	*	253.23
	12	40.81			68.20	23.28	•	88.05	22.65	*	104.48		*	301.53
	13	35.64			63.99	24.00	•	142.21	24.00	•	109.88		*	351.72
	14	40.75		*	67.58	24.00	•	140.49	23.25	*	104.16	23.00		352.97
	15	23.16			63.54	23.34	٠	140.89	23.56	*	75.62	15.57		303.24
	16	44.50		*	49.82	20.72	*	61.46	12.55	*	144.76	20.97		300.55
	17	39.94		٠	0.00	0.00	*	134.50	23.04	*	132.67		*	307.11
	18	45.8			35.98		*	76.73	21.66	*	127.13	23.73	*	285.74
	19	44.1		٠	62.66	23.42	•	57.36	16.33	*	111.15	22.10	•	275.30
	20	53.4		٠	54.87	22.58	*	85.62	21.65	•	81.25	20.56	*	275.21
	21	52.63			60.37	20.75	*	94.74	20.76	•	165.52	23.85	•	373.27
	22	27.6	-	*	77.25	23.33	•	102.43	22.55	•	145.55	23.55	*	352.85
	23	34.4	_		67.76	23.77	*	115.73	21.34	*	115.68	18.82	*	333.67
	24	32.5	_		74.80	24.00	•	139.09	22.42	•	77.06	21,48	*	323.53
	25	32.9	_		71.47	24.00	*	120.30	23.13	*	84.20	22.28	*	308.96
	26	37.5	_		45.52	15.93	•	129.20	22.30		63.13	19.04	*	295.36
	27	35.8		٠	74.18	23.37	*	129.95	21.48	ŧ	42.96	13.38	*	282.92
	28	30.9			66.42	21.94		118.16	22.94	•	104.99	24.00	•	
	29	38.7		*	70.72	24.00		56.49	19.20	*	119.70	24.00	*	
	30	36.5			67.05	24.00	•	71.95	22.51	•	109.25	22.73	•	
	31	36.8				24.00		67.38	22.26	•	79.95	14.85	•	253.44
+	31	1167.6			1894.92	**		3053.05	653.49		3375.98	652.58		9491.57
TOTAL		1141.0	2 017.22											
	~~~~	N DAYS	28.2			28.2			27.2			27.2		
AVERN AVERN			41.34			67.23			112.13			124.16		344.85
A V E.K.N.			****											

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#### MICHIGAN DEPARTMENT OF NATURAL RESOURCES

### DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER OD9C

DISCHARGE NUMBER

		M	IONITOF	RING I	PERIOD	
	YEAR	MO	DAY		YEAR	мо
FROM	96	07	01	тО	96	07

PERMITTEE NAME/ADDRESS (Include Facility
Name/Location if different)
NAME E. B. Eddy Paper, Inc.
ADDRESS 1700 Washington Ave.
Port Huron, MI 48060

Burney Co

ACILITY

OCATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Stephen J. Bentley
Technical Director
TYPED OR PRINTED

		OUTFALL O	09C (1 OF I)		
PAR #:		50050 P 0 0	00310 R 0 0	00530 R 0 0	00145 P 0 0
PARAMETER:		FLOW	BOD, 5-DAY	TSS	TOTAL
LIMIT:		REPORT	2531	3863	PRODUCTION
UNITS:		MGD	LBS/DAY	LBS/DAY	TPD
DATE:	1	1,21	17	. 61	44.6
D.11.2.	1 2	2.36	116	118	255.8
	3	2.15	403	301	191.5
	4	0.88	94	117	0.0
	5	1.02	136	145	0.0
	- 6	1.07	· 32	54	0.0
	7	1.01	25	101	0.0
	8	1.63	32	88	105.8
	9	1.72	201	252	185.9
	10	1.91	381	217	253.8
	11	1.88	230		192.6
	12	1.28	226		19.5
	13	1.02	ຸ 104		27.0
	14	1.15	98		16.3
	15	1.86	202		239.8
	16	1.87	499		227.0
	17	1.76	458		196.8
	18	1.44	365		120.3
	19	1.43	515		108.6
	20	1.54	303		0.0
	21	1.11	133		0.0
	22	1,40	177		142.2
	23	2.01	350		
	24	1.69	388		109.8
	25	1.71	378		199.6
	26	1.30	208		
	27	1.05	151		
	28	1.87	181		
	29	1.93	328		
	30	2.06	694		_
	31	2.17	711	188	220.0
AVERAGE:		1,56	263	3 233	**SEE ATTACHED**
TOTAL:		48,49	8139		
MINIMUM:		0,88	. r	7 22	
MAXIMUM:		2.36	71		255.8

.... Deligitivity of INATORAL RESOURCES

#### DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER

0090 DISCHARGE NUMBER

		М	ONITOR	ING F	PERIOD		
	YEAR	МО	DAY		YEAR	MO	DAY
FROM	96	07	0	TO	96	07	31

ERMITTEE NAME/ADDRESS (Include Facility ame/Location if different)
E. B. Eddy Paper, Inc. 1700 Washington Ave. DDRESS Port Huron, MI 48060

Jul-96

CILITY

CATION

100

between 6 months and 5 years.)

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY. OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of

OF PRINCIPAL EXECUTIVE OFFICER OF AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER Stephen J. Bentley Technical Director TYPED OR PRINTED

DEINK PULP MILL GROSS PRODUCTION AND PRODUCTION HOURS

(OUTFALL 009C):

	TPD	HRS
1	44.59	7.00
2	255.78	23.30
3	191.53	15.40
4	0.00	0.00
5	0.00	0.00
6	0.00	0.00
7	0.00	0.00
8	105.80	17.50
9	185.85	21.40
10	253.79	22.40
11	192,60	17.10
12	19.47	0.00
13	27.05	0.00
14	16.26	8.20
15	239.77	24.00
16	227.03	24.00
. 17	196.79	21.00
18	120.31	10.50
19	108.56	6.20
20	0.00	0.01
21	0.00	2.00
22	142.17	19.40
23	255.51	24.00
24	109.78	9.50
25	199.58	19.50
26	27.44	19.60
27	0.00	1.70
28	147.32	24.00
29	213.68	24.00
30	200.95	24.00
31	219.99	24.00
TOTAL	3701.58	⁶ 409.71
PRODUCTI	ON DAYS	17.1
AVERAGE		216.83

### Attachment L NPDES Discharge Monitoring requirements Update - June - July 1996



### E. B. EDDY PAPER, INC.

Phone: (810) 982-0191 Fax: (810) 982-7124 1700 Washington Ave. P.O. Box 5003 Port Huron, Michigan 48061-5003

August 19, 1996

Ms. Patricia Brandt, PCS Coordinator MDEQ- Surface Water Quality Division P.O. Box 30273 Lansing MI 48909-7773

Dear Ms. Brandt:

Enclosed you will find a update of the E.B. Eddy Paper, Inc. NPDES Discharge Monitoring Report (DMR) for the months of June and July 1996. Our contracted lab had equipment problems and was unable to perform metal analyses until this month. Therefore we are submitting the updated DMRs at this time.

The information updated include:

Outfall 008A: Total Copper, Total Cadmium, Total Lead

Outfall 009A: Total Copper, Total Cadmium

Please do not hesitate to call me if there are any problems.

Sincerely,

Christine J. Lupu

Environmental Engineer

cc: S. Bentley

PERMITTEE NAME ADDRESS (Include Facility Name   Location if different)  1AME F B F O Y  NDDRESS P O B O X 5 0  P O R T H V	03	R INC I 48060	. MI 000	(2-16)		SYSTEM (NPDES) RT (DMR) (17-19) CSA ARGE NUMBER	outfall (SUBR DI F-FINA	7)	ъβ	Jack K 123	1, ver 45	_
			-	моиі.	TORING PERIO	D	MA-50 R					•
-OCATION			FROM YEAR	MO DA		06 01				•		
				(22-23) (24-		28-29) (30-31) N	OTE: Read instru	ctions befo	re com	pleting thi	s form	n.
PARAMETER		(3 Card Only) QU/ (46-53)	ANTITY OR LOADIN (54-61)	G	(4 Card Only) (38-45)	QUALITY OR CONC (46-53)	ENTRATION (54-61)		1 1101	FREQUENCY OF ANALYSIS		MPLE /PE
(32-37)		AVERAGE	MAXIMUM	STINU	MINIMUM	AVERAGE	MAXIMUM	UNITS	EX (62-63)	(64-68)	1	7-70)
Cadmium, Total	SAMPLE MEASUREMENT					0.1	0.3	(28)	0	Weeklg	Crit	1924
61027 101 Esfluent Gross Value	PERMIT REQUIREMENT					Aeport 3004 Avb	Report Baily MX	U6/L				
Copper, Total (ASCV) 01042 101	SAMPLE MEASUREMENT					4.8	24	(28)	0	Weekly	Cong	49 y
Explent Gross Value	PERMIT REQUIREMENT					Report 30 DKAUG	Report Daily det	V6/L				
Lead, Total (As PB)	SAMPLE MEASUREMENT					3,7	15	(38)	0	Week ly	Con	ypay
01051 101 Estuent Gross Value	PERMIT REQUIREMENT					Report 30 DAANG	Report Daily 12t	V6/L				
	SAMPLE MEASUREMENT											
	PERMIT REQUIREMENT											
	SAMPLE MEASUREMENT	,										
	PERMIT REQUIREMENT											
	SAMPLE MEASUREMENT											
	PERMIT REQUIREMENT											
	SAMPLE MEASUREMENT											
	PERMIT REQUIREMENT						1					
Christine J. Lupu Environmental Engineer Typed or printed	AND ON M OBTAIL IS TR NIFICA THE A	TIFY UNDER PENALTY AM FAMILIAR WITH THE AY INQUIRY OF THOSE INING THE INFORMATIC TUE. ACCURATE AND CO ANT PENALTIES FOR POSSIBILITY OF FINE 5 C \$ 1319. IPPNAILE A T MAXIMUM IMPLIAMENTICS	INFORMATION SUBMITT INDIVIDUALS IMMEDIAT IN, I BELIEVE THE SI OMPLETE I AM AWARE SUBMITTING FALSE IN NO IMPRISONMENT SEE der these statutes may i	ED HEREIN, A IELY RESPONS UBMITTED INF THAT THERE FORMATION IBUSC \$ nclude (inex up	ND BASED SIBLE FOR ORMATION ARE SIG- INCLUDING 1001 AND I IO \$10,1001 BIGNAT	SIME	- EXECUTIVE	TELEPHON  0 982-6  EA NUMI	191	96 0	28 MO	19 DAY
Contracted Lab h	ad Equipm	Reference all attachment proble	ins here)	ie. Die	d not recei	ive data un	til Augus	+,	_			

ADDRESS PO BOX 500	ER INC 3 MI 48		UISCHA UI 00	ARGE MOI (2-16)	0	PT (DMR) (17-19) DOGA	(SUBR DD)	ST	ST CLAIR RI 12345		
ACILITY .OCATION			FROM YEAR Qb	·····	TORING PERIC	DD /	F-FINAL MAJOR				
	- <del>-</del>	(3 Card Only) QU		(22-23) (24	25) (26-27) () (4 Card Only)	28-29) (30-31) N	IOTE: Read instru	ctions befor	ТТ		
PARAMETER (32-37)		(46-53)	(54-61)	Ι	(38-45)	(46-53)	(54-61)	T	NO.	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS	(62-63)	(64-68)	(69-70)
Cadmium, Total	SAMPLE MEASUREMENT				0.77	0.14	0,28	(28)	0	Weekly	(021024)
01027 10 1 Estiment Gross Value	PERMIT REQUIREMENT					Report 30 DA AVE	Report Daily HX	U6/L			
Capper Total (ASCU)	SAMPLE MEASUREMENT					17_	29	(28)	0	neek/y	Compa4
(ASCV) 01042 101 ESQUENT Gross Value	PERMIT REQUIREMENT					Report 30 DA AVE	Report Daila MX	V6/2		0	
	SAMPLE MEASUREMENT						•				
	PERMIT REQUIREMENT			÷							
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT						1				
Christine J. Lupu Environmental Engineer	AND A ON M OBTAIR IS TRI NIFICA THE 33 U S	M FAMILIAR WITH THE Y INQUIRY OF THOSE NING THE INFORMATIC UE. ACCURATE AND CONT. PENALTIES FOR COSSIBILITY OF FINE AIC. \$ 1319 Penalties un	OF LAW THAT I HAVE INFORMATION SUBMITT INDIVIDUALS IMMEDIATED IN INDIVIDUALS IMMEDIATED IN INDIVIDUALS IMMEDIATED FALSE IN INDIMPRISONMENT SEE INDIVIDUALS IN INDIMPRISONMENT SEE INDIVIDUALS INDIVIDU	ED HEREIN, A FELY RESPONS UBMITTED INF THAT THERE FORMATION IB USC I notude fines up	NO BASED SIBLE FOR FORMATION ARE SIG INCLUDING 1001 AND SIGNAT	URE OF PRINCIPA		TELEPHON	1910	96 C	)8 19
* Contracted Lab had	equipment	problems i	n June Di	d not n	eceive date	until A				<u> </u>	

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)  YAME E. B. Eday PAG ADDRESS P.O. BOX 500  PORT HURON	PER, INC.	060	MI O	UTANT DISC RGE MOI (2-16) DO 2/6 C		ORT (DMR)	ONFAIL OO (SUBRDD) F-FINA	8 7	0 \$1/- 12	uck Kl 345	i ver
ACILITY		·	YEAR		TORING PERIO	DD DAY	MAJOR				
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PARAMETER		(46-53)	(54-61)	,	(38-45)	(46-53)	(54-61)	<del>,</del>	140.	OF ALYSIS	SAMPLE TYPE
(32-37)		AVERAGE	MUMIXAM	UNITS	MINIMUM	AVERAGE	MUMIXAM	פדואט (	1	4-68)	(69-70)
Cadmium Total (AS CD)	SAMPLE MEASUREMENT					0.02	0.10	(28)	O W	ekly* (	Smp24
Esquent Gross Value	PERMIT REQUIREMENT					Report 30 DA Aug	Report Daily Hx	U6/L			
Copper, Total (ASCU) 01042 101	SAMPLE MEASUREMENT		31 35 H2			22,5	56 Report	(28)	O Nec	.k/y* (	0mp24
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Christine J. Lupu	OBTAR	NING THE INFORMATIO	INDIVIDUALS IMMEDIAT ON: I BELIEVE THE SI OMPLETE I AM AWARE	UBMITTED INF	FORMATION   / ////	TINTIAN /	Jupu 8				
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TYPED OR PRINTED	33 U S	C § 1319. (Penalties ur maximum imprisonment)	ider these statutes may i of between 6 months and 5	nclude fines uj zears.i	) to \$10,000	ICER OF AUTHORIZ	1 2 2	A NUMB		AR MO	<del></del>
COMMENT AND EXPLANATION OF A	•	-									
* Contracted Lab ha	d equipment	+ problems	in June +	July	. Did not	receive de	ata until	Augu:	57,		

PERMITTEE NAME/ADDRESS (Include Sacility Name/Location if different)  NAME E. B. FDDY PA  ADDRESS PO BOX 5003  PORT HURON	PER, INC. B MI 4806	0	DISCHA MI O	UTANT DISC LRGE MOI (2-16) DOD 2) & ( T NUMBER		RT (DMR) (17-19) OO 9 A  ARGE NUMBER	Ovtfall Or (Subr OA) Fr Final	09 T	ο .	34. Cla 12343	ir K) ve
			-	MONI.	TORING PERIC	)D	Major				
LOCATION			FROM O	мо в		MO DAY					
		<del></del>	_ <u>16</u>	(22-23) (24-	1 16	07 31 28-29, (30-31) N	IOTE: Read instru	ctions befor	e com	pleting th	is form.
PARAMETER		(3 Card Only) QU (46-53)	ANTITY OR LOADIN		(4 Card Only) (38-45)	QUALITY OR CONC	ENTRATION . (54-61)		NO.	FREQUENC'	TVOE
(32-37)		AVERAGE	MAXIMUM	STINU	MINIMUM	AVERAGE	MAXIMUM	UNITS	(62-63)	(64-68)	(69-70)
Cadmium, Total	SAMPLE MEASUREMENT		:			0.2	0.3	(88)	0	Weetly*	Comp24
Cadmium, Total (4s CD) 01027 101 Essivent Gross Value	PERMIT REQUIREMENT					Report 30 DA AVE	Aeport Boily He	U6/L			
Copper Total (As CV)	SAMPLE MEASUREMENT					51	140	(28)	0	Weet/j	Compo24
Oloya 101 Eschent Gross Value	PERMIT REQUIREMENT					Report 30 DR AVG	Daily Mx	U6/L			
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Christine J. Lupu	OBTAIN IS TRI	NING THE INFORMATION. UE, ACCURATE AND C	INDIVIDUALS IMMEDIAT ON, I BELIEVE THE SU OMPLETE I AM AWARE	INFORMATION OF THAT	ORMATION ARE SIG	Mino /	Jupu -				
Environmental Engine	er NIFICA	INT PENALTIES FOR POSSIBILITY OF FINE A	SUBMITTING FALSE INI ND IMPRISONMENT SEE Iden these statutes may in	FORMATION: 18 USC 5	INCLUDING SIGNAT	URE OF PRINCIPAL	EXECUTIVE 0/	0 1982-0	19(	96 0	08 19
TYPED OR PRINTED	und or	maximum imprisonaunit	of between 6 months and 5	years.)		CER OR AUTHORIZ	ED AGENT ARE	A NUME	ER	YEAR	MO DAY
* Contracted Lab				ne + J	July. Did.	not receiv	e data v	ntil A	vgvs	st,	

DISCHARGE MONITORING REPORT

## DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER

DO9A

DISCHARGE NUMBER

		M	ONITOF	RING F	PERIOD		
	YEAR	мо	DAY		YEAR	мо	DAY
FROM	96	06	01	то	96	06	30

JAME	tion if different) E. B. Eddy Paper, Inc.	
DDRESS	1700 Washington Ave.	
	Port Huron, MI 48060	·

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. \$ 1001 AND 33 U.S.C. \$ 1319. (Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE
OFFICER OR AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Christine J. L. Pu

Environmenta Engineer
TYPED OR PRINTED

		OUTF	FALL 009A (2 OF 2)	
PAR #:	01042 1 0 1	01027 1 0 1	61406 R 0 0	80092 1 0 0
PARAMETER:	COPPER, TOTAL	CADMIUM, TOTAL	TOXICITY	DECHLOR REAGENT
LIMIT:	REPORT	REPORT	1.0 DAILY MAX	REPORT
UNITS:	ug/L	ug/L	T.U.	LBS/DAY
DATE: 1				259.0
2				272.8
3				287.8
4	29	0.00		291.8
5				294.3
6				288.1
7				298.1
8				298.1
9				293.1
10				297.2
11				282.5
12	28	0,28		282.5
13				273.1
14				250.6
15				256.8
16				267.1
17				261.8 251.8
18		0.00		254.0
19	0	0.00		281.8
20				261.8 297.5
21				297.2
22 23				242.4
23				239.6
25			0,00	283.1
26	0	0.20	0.00	302.2
27		0,20		317.5
28				330,5
29				330.5
30				330.5
19(extra)	26	0,20		
•				
AVERAGE:	17	0.14	0.00	283.77
TOTAL:	83	0.68	0.00	
MINIMUM:	0	0.00	0.00	
MAXIMUM:	29	0.28	0.00	330.5

10 mg 12

#### MICHIGAN DEPARTMENT OF NATURAL RESOURCES

#### DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER

OOSA DISCHARGE NUMBER

MONITORING PERIOD YEAR DAY YEAR DAY FROM ط۹ 01 96 06 3 O

Name/Locat NAME	E. B.	Eddy	Paper	Inc.	
			ington		 
			_	18060	
	· · · · · · · · · · · · · · · · · · ·		·····		 
FACILITY .					 
_OCATION					 

·····

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include tines up to \$10,000 and or maximum imprisonment of between 6 months and 6 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Christine J. Lupu Environmental Engineer TYPED OR PRINTED

	OU	TFALL 008A (2 OF 2)	) <u></u>	-	
PAR #: PARAMETER: LIMIT: UNITS:	01042 1 0 1	01027 1 0 1 CADMIUM, TOTA REPORT ug/L	01051 1 0 1 LEAD, TOTAL REPORT ug/L	80092 I 0 0 DECHLOR, REAGEN REPORT LBS/DAY	t t
DATE: 1		4) *		25.3	
2		- **		27.5	
3			•	22.8	
4	0	0.0	0.0	23.5	
5				25.0	
6				27.8	
7				24.1	
8	;			. 25.6	
9				28.2	
10				34.4	
11				36,0	
12	. 0	0.0	1.6	41.0 43.8	
13		•		43.8 44.4	•
14				43.5	•
15				39,1	
16				36.6	
17 18				35.7	
18	0	0.0	0.0	36.0	
20	U	0.0	, 0.0	39.7	
21				43,2	
22				34,4	
23	Samuelle	स्थानुष्टम् । स्थानुष्टम्	· · · · · · · · · · · · · · · · · · ·	22.5	The second state of the least state of the second state of the sec
24	, Landania C.		र विकास किस्तर विकास	28.5	A STATE OF THE STA
25				40.0	
26	24	0.1	1.8	34.1	
27				26,6	
28				26.6	
29				30.0	
30				30.7	
19(extra)	0	0,3	15.0		•
AVERAGE:	4.8	0.1	3.7	32.6	
TOTAL:	24	0,4	18.4		
MINIMUM:	0	0.0	0.0	22.5	
MAXIMUM:	24	0,3	15.0	44,4	

# DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160
PEAMIT NUMBER

008A DISCHARGE NUMBER

	MONITORING PERIOD						
	YEAR	MO	DAY		YEAR	МО	DAY
FROM	96	07	01	то	96	07	31

Name/Loca Name	tion if different) E. B. Eddy Paper, Inc.	
	1700 Washington Ave.	
	Port Huron, MI 48060	
FACILITY		
OCATION		

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE, I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of betyeen 6 months and 5 years.)

MUSTINE () JUSTI SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Christine J. Lupu,
Environmental Fugueer
TYPED OR PRINTED

	OU	•		
PAR #:	01042 1 0 1	01027 1 0 1	01051 1 0 1	80092 1 0 0
PARAMETER:		CADMIUM, TOTA	LEAD, TOTAL	DECHLOR, REAGE
LIMIT:	REPORT	REPORT	REPORT	REPORT
UNITS:	ug/L	ug/L	ug/L	LBS/DAY
DATE: 1				8,4
2	17	0.0	1.2	7.8
3		0,0	2	3.0
4				7.8
5				10.8
6				10.3
7				9.2
8				9.9
9	56	0.0	0.0	9.3
10				8.5
11				8.8
12				8.8
13		•		11.5
14				10.1
15				9.4
16				8.3
17		0.1	1.5	8.4
18				8.2
19			•	10.0
20				7.8
21				8.4
22				9.0
23	0	0.0	0.0	8.7
24				11.3
25				12.6
26				11.5
27				8.3
28				8.4
29			• •	8.7
. 30	12	0.0	2.8	9.0
31	20			8.7
23(extra)	39	0.0	1.3	9.1
AVERAGE:	22.5	0.02	1.1	
TOTAL:	135	0.10	6.8	280.7
MINIMUM:	. 0 56	0.00	0.0	3.0
MAXIMUM:	30	0.10	2.8	12.6

## DISCHARGE MONITORING REPORT DAILY MONITORING

MI0002160 PERMIT NUMBER 009A DISCHARGE NUMBER

i	MONITORING PERIOD						
	YEAR	MO	DAY		YEAR	МО	DAY
FROM	96	07	81	το	96	07	31

PERMITTEE	E NAME/ADDRESS (Include Facility	
Vame/Locat	etion if different) E. B. Eddy Paper, Inc.	
	1700 Washington Ave.	
	Port Huron, MI 48060	<u>,</u>
ACILITY		
.OCATION		

ing a regular title.

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THE SUBMITTED INFORMATION IS TRUE. ACCURATE AND COMPLETE, I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBLITY OF FINE AND IMPHISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § .1319. (Penalties under these statutes may include lines up to \$10,000 and or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF FRINCIPAL EXECUTIVE
OFFICER OR AUTHORIZED AGENT

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Christing J. Lupu

Environmedal Engineer
TYPED OR PRINTED

ţ

10. Bill 19. Will

		•	OUTF	ALL 009A (2 OF 2) -	
PAR #: PARAMETER: LIMIT: UNITS:		01042 I 0 1 COPPER, TOTAL REPORT ug/L	01027 1 0 1 CADMIUM, TOTAL REPORT ug/L	61406 R 0 0 TOXICITY 1.0 DAILY MAX T.U.	80092 I 0 0 DECHLOR, REAGENT REPORT LBS/DAY
DATE:	1				105.7
	2	43	0		105.7
	3				74.0
	4				105.7
	5				85.0
	6				79.2
	7				79.2
	8				79.2
	9	39	0		180.0
	10				190.2
	11				194.0
	12				194.5
	13				209.9
	14				193.9
	15				184.8
	16			0.00	172.6
	17	140	0		182.1
	18				165.0
	19				156.7
	20				203.1
	21				208.6
	22				209.5
	23	3	0		213.1
	24				222.9
	25				164.7
	26				176.8
	27				180.3
	28				177.4
	29				170.7
	30	51	0		170.7
	31				175.I
23(c)	ctra)	31			
AVERAGE:		51	0.2	0	
TOTAL:		307	1.0	0.00	5010.1
MINIMUM:		3	0.0	0.00	74.0
MAXIMUM:		140	0.3	0.00	222.9

### Attachment M NPDES Permit September 21, 1993

NATURAL RESOURCES
COMMISSION

JERRY C. BARTNIK
"RRY DEVUYST
"L. EISELE
"MES HILL
DAVID HOLLI
JOEY M. SPANO

JORDAN B. TATTER



### DEPARTMENT OF NATURAL RESOURCES

Stevens T. Meson Building, P.O. Box 30028, Lansing, MI 48909

ROLAND HARMES, Director

September 21, 1993

#### CERTIFIED MAIL

E. B. Eddy Paper, Inc. P. O. Box 5003 Port Huron, Michigan 48061-5003

Gentlemen:

SUBJECT: NPDES Permit No. MI0002160

Your National Pollutant Discharge Elimination System (NPDES) Permit has been processed in accordance with appropriate state and federal regulations. It contains the requirements necessary for you to comply with state and federal water pollution control laws.

REVIEW THE PERMIT EFFLUENT LIMITS AND COMPLIANCE SCHEDULES CAREFULLY. These are subject to the criminal and civil enforcement provisions of both state and federal law. Permit violations are audited by the Michigan Department of Natural Resources and the United States Environmental Protection Agency and may appear in a published quarterly noncompliance report made available to agencies and the public.

Your monitoring and reporting responsibilities must be complied with in accordance with this permit. If applicable, Discharge Monitoring Report forms will be transmitted to you in the near future. These reports are to be submitted monthly or otherwise as required by your NPDES permit.

Any reports, notifications, or questions regarding the attached permit or NPDES program should be directed to the following address:

Roy Schrameck, District Supervisor Detroit Area District Office 38980 Seven Mile Road Livonia, Michigan 48152 Telephone: (313) 953-0241

> Esco. ZZ SEP 93

E. B. Eddy Paper, Inc. Page 2 September 21, 1993

NOTE: All references within this permit made to the Water Quality Division or Chief of the Water Quality Division are to refer to the Surface Water Quality Division or Chief of the Surface Water Quality Division, respectively.

Sincerely,

William E. Mc Crackengs William E. McCracken, P.E.

Chief, Permits Section

Surface Water Quality Division

517-373-8088

Enclosure: Permit

cc: EPA-Region V (2)

208 Agency - Southeast Michigan Council of Governments

Planning and Special Programs Section, SWQD Mr. Roy Schrameck - Detroit District, SWQD (2)

Mr. Paul Blakeslee, Regional Supervisor, Region III, SWQD

Data Entry, SWQD

Files

MICHIGAN WATER RESOURCES COMMISSION AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq; the "Act"), and the Michigan Water Resources Commission Act, as amended, (Act 245, Public Acts of 1929, as amended, the "Michigan Act"),

E. B. Eddy Paper, Inc. P. O. Box 5003 Port Huron, Michigan 48061-5003

is authorized to discharge from a facility located at

1700 Washington Avenue Port Huron, Michigan 48060

designated as E B Eddy Paper Inc

to the receiving water named the St. Clair River and the Black River in accordance with effluent limitations, monitoring requirements and other conditions set forth in this permit.

This permit takes effect on December 1, 1993. Any person who feels aggrieved by this permit may file a sworn petition with the Executive Secretary of the Michigan Water Resources Commission, setting forth the conditions of the permit which are being challenged and specifying the grounds for the challenge. The Commission may reject any petition filed more than 60 days after issuance as being untimely. Upon granting of a contested case to the applicant, the Commission shall review the permit to determine which contested term shall be stayed until the Commission takes its final action. If a contested condition is a requirement placed on wastewater covered by a new or increased discharge authorization, such increased discharge authorization shall be stayed until the Commission takes final action. All other conditions of the permit remain in full effect. If the contested condition is a modification of a previous permit condition and the Commission determines the contested condition shall be stayed, then such previous condition remains in effect until the Commission takes final action. During the course of any administrative proceeding brought by a person other than the applicant, the conditions of this permit will remain in effect, unless the Commission determines otherwise.

This permit and the authorization to discharge shall expire at midnight October 1, 1998. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Michigan Water Resources Commission to the Permits Section of the Surface Water Quality Division no later than 180 days prior to the date of expiration.

This permit is based on an application submitted on December 30, 1992 as ammended through July 9, 1993. On its effective date this permit shall supersede NPDES Permit No. MI0002160, expiring June 30, 1993.

Issued this 19th day of August, 1993, by the Michigan Water Resources Commission.

William E. McCracken

Villeun Zo M'Crash

Executive Secretary

#### A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

#### 1. Final Effluent Limitations, Outfall 008

During the period beginning upon the effective date of this permit and lasting until the expiration date of this permit, the permittee is authorized to discharge a maximum of one million six hundred thousand (1,600,000) gallons per day of noncontact cooling water and filter backwash water from outfall 008 to the Black River. Such discharge shall be limited and monitored by the permittee as specified below:

		scharge Li	mitations				
	lbs/	day	Other Lim	itations	Monitoring Requirements		
Effluent	Monthly	Daily	Monthly	Daily	Measurement	Sample	
Characteristic	Average	Maximum	Average	Maximum	Frequency	Type	
Flow (MGD)	(report)	(report)			Daily	Report Total Daily Flow	
Total Suspended Sol	ids						
May 1 - Oct 31	123	435			Daily	24 Hr Composite	
Nov 1 - Apr 30	195	880			Daily	24 Hr Composite	
Total Cadmium						٠	
Until May 31, 199	7		(report)	(report)	Weekly	24 Hr Compos'	
From Jun 1, 1997	0.01		0.9 ug/1	-	Weekly	24 Hr Compos	
Total Copper						•	
Until May 31, 199	7		(report)	(report)	Weekly	24 Hr Composite	
From Jun 1, 1997			22 ug/1		Weekly	24 Hr Composite	
Total Lead			•			•	
Until May 31, 199	7		(report)	(report)	Weekly	24 Hr Composite	
From Jun 1, 1997			5.6 ug/1		Weekly	24 Hr Composite	
Total Residual Chlo	rine			36 ug/l	Daily	Grab	
Outfall Observation	(report)				Daily	Visual	
•			Daily <u>Minimum</u>	Daily Maximum			
pH (Standard Units)			6.5	9.0	Daily	Grab	

a. The receiving stream shall contain no unnatural turbidity, color, oil film, floating solids, foams, settleable solids, or deposits, in quantities which are or may become injurious to any desinated use, as a result of this discharge.

(continued)

b. Samples, measurements, and observations taken in compliance with the monitoring requirements above shall be taken prior to discharge to the Black River.

#### Section A.l. (continued)

- c. Any unusual characteristics of the discharge (i.e., unnatural turbidity, color, oil film, floating solids, foams, settleable solids, or deposits, in quantities which are or may become injurious to any designated use) shall be reported immediately to the Detroit District Supervisor of the Surface Water Quality Division followed with a written report within 5 days detailing the findings of the investigation and the steps taken to correct the condition.
- d. In the event the permittee shall require the discharge of water treatment additives in addition to any previously approved by the Detroit District Supervisor of the Surface Water Quality Division, the permittee shall notify the Detroit District Supervisor. Written approval from the Detroit District Supervisor to discharge such additives at specified levels shall be obtained prior to discharge by the permittee. The permit may be modified in accordance with the requirements of Part II.B.4. if a constituent of the additive or additives requires limiting.
- e. The term noncontact cooling water shall mean water used for cooling which does not come into direct contact with any raw material, intermediate product, by-product, waste product, or finished product.
- f. U.S. EPA approved analytical methods shall be used for all parameters.
- g. Total residual chlorine (TRC) shall be analyzed using U.S. EPA Method 330.1 or the Orion Electrode Model 97-70. The permittee may use dechlorination techniques to achieve the applicable limitations using Kedchem 5700 or other dechlorinating reagents approved by the Detroit District Supervisor of the Surface Water Quality Division as dechlorinating reagents. The permittee shall report monthly, on the Discharge Monitoring Reports, the quantity of each dechlorinating reagent used per day.
- i. The permittee may demonstrate to the Michigan Water Resouces Commission that less restrictive limits for total cadmium, total copper and total lead than contained in the permit would meet Water Quality Standards based on a rationale(s) which would be included in such a demonstration. The permittee shall notify the Detroit District Supervisor of the Surface Water Quality Division if a demonstration would be attempted. The effective date of the limits shall not be stayed pending the demonstration attempt. The permit may be modified after public notice and Commission approval of the recommended permit modification in accordance with the requirements of Part II.B.4.

#### Section A.l. (continued)

- c. Any unusual characteristics of the discharge (i.e., unnatural turbidity, color, oil film, floating solids, foams, settleable solids, or deposits, in quantities which are or may become injurious to any designated use) shall be reported immediately to the Detroit District Supervisor of the Surface Water Quality Division followed with a written report within 5 days detailing the findings of the investigation and the steps taken to correct the condition.
- d. In the event the permittee shall require the discharge of water treatment additives in addition to any previously approved by the Detroit District Supervisor of the Surface Water Quality Division, the permittee shall notify the Detroit District Supervisor. Written approval from the Detroit District Supervisor to discharge such additives at specified levels shall be obtained prior to discharge by the permittee. The permit may be modified in accordance with the requirements of Part II.B.4. if a constituent of the additive or additives requires limiting.
- e. The term noncontact cooling water shall mean water used for cooling which does not come into direct contact with any raw material, intermediate product, by-product, waste product, or finished product.
- f. U.S. EPA approved analytical methods shall be used for all parameters.
- g. Total residual chlorine (TRC) shall be analyzed using U.S. EPA Method 330.1 or the Orion Electrode Model 97-70. The permittee may use dechlorination techniques to achieve the applicable limitations using Kedchem 5700 or other dechlorinating reagents approved by the Detroit District Supervisor of the Surface Water Quality Division as dechlorinating reagents. The permittee shall report monthly, on the Discharge Monitoring Reports, the quantity of each dechlorinating reagent used per day.
- i. The permittee may demonstrate to the Michigan Water Resouces Commission that less restrictive limits for total cadmium, total copper and total lead than contained in the permit would meet Water Quality Standards based on a rationale(s) which would be included in such a demonstration. The permittee shall notify the Detroit District Supervisor of the Surface Water Quality Division if a demonstration would be attempted. The effective date of the limits shall not be stayed pending the demonstration attempt. The permit may be modified after public notice and Commission approval of the recommended permit modification in accordance with the requirements of Part II.B.4.

#### Section A.

3. Final Effluent Limitations, Outfall 009C (New Deinking Facility)

During the period beginning upon the commencement of discharge from the deinking facility and lasting until the expiration date of this permit, the permittee is authorized to discharge a maximum of four million (4,000,000) gallons per day of treated process wastewater from the new mill from outfall 009C through outfall 009 to the St. Clair River. Such discharge shall be limited and monitored by the permittee as specified below:

	Di 1bs/		imitations Other Limi	Ítations	Monitoring Re	auirements
Effluent Characteristic	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Flow (MGD)	(report)	(report)			Daily	Report Total Daily Flow
TIER 1 - Production	Rate Of 1	78 Tons/D	ay Or Less			
BOD ₅	1104	2029			Daily	24 Hr Composite
Total Suspended Solids	1638	3097			Daily	24 Hr Composite
TIER 2 - Production	Rate Betw	een 179 A	nd 222 Tons	s/Day		
BOD ₅	1376	2531			Daily	24 Hr Composite
Total Suspended Solids	2042	3863			Daily	24 Hr Composite
TIER 3 - Production	Rate Betw	een 223 A	nd 250 Tons	s/Day		
BOD ₅	1550	2850			Daily	24 Hr Composite
Total Suspended Solids	2300	4350			Daily	24 Hr Composite

a. Samples, measurements, and observations taken in compliance with the monitoring requirements above shall be taken prior to mixing with other wastestreams.

b. The production rate shall be determined as specified in Part I.A.10., Page 10 of 20.

c. The permittee shall report the mass of  $BOD_5$  and Total Suspended Solids discharged under the appropriate tier set of limits, depending upon the production rate and indicate zero (0) flow on the discharge monitoring reports not used.

#### Section A.

#### 4. Final Effluent Limitations, Outfall 009

During the period beginning upon the effective date of this permit and lasting until the expiration date of this permit, the permittee is authorized to discharge a maximum of eight million (8,000,000) gallons per day of treated process wastewater, power plant wastewater, and noncontact cooling water and an unspecified amount of storm water runoff from outfall 009 to the St. Clair River. Such discharge shall be limited and monitored by the permittee as specified below:

	Di	scharge L:	imitations			
	1bs/		Other Limi		Monitoring Requirements	
Effluent	Monthly	Daily	Monthly	Daily	Measurement	Sample
<u>Characteristic</u>	Average	<u>Maximum</u>	Average.	Maximum	Frequency	<u>Type</u>
Flow (MGD)	(report)	(report)	•		Daily	Report Total Daily Flow
Total Residual Chlor	ine			0.75 mg/1	Daily	Grab
Total Phosphorus	67		1.0 mg/1		Weekly	24 Hr Composite
Acute Toxicity		•			•	÷
Until Dec 31, 1993	3			(report)	Quarterly	24 Hr Compos
From Jan 1, 1994			·	1.0 TUA	Monthly	24 Hr Composite
Total Cadmium	_					
Until May 31, 1997	7		(report)	•	Weekly	24 Hr Composite
From Jun 1, 1997		,	•	21 ug/1	Weekly	24 Hr Composite
Total Copper						
Until May 31, 1997	,		(report)	(report)	Weekly	24 Hr Composite
From Jun 1, 1997				43 ug/1	Weekly	24 Hr Composite
Outfall Observation	(report)				Daily	Visual
•		·	Daily Minimum	Daily <u>Maximum</u>		
pH (Standard Units)			6.0	9.0	Daily	Grab

- a. The receiving stream shall contain no unnatural turbidity, color, oil film, floating solids, foams, settleable solids, or deposits, in quantities which are or may become injurious to any designated use, as a result of this discharge.
- b. Samples, measurements, and observations taken in compliance with the monitoring requirements above shall be taken prior to discharge to the St. Clair River.

(continued)

### Attachment N

Release Notification From Wastewater Treatment Plant - 3/22/96



### E. B. EDDY PAPER, INC.

March 22, 1996

Phone: (810) 982-0191 Fax: (810) 982-7124 1700 Washington Ave. P.O. Box 5003 Port Huron, Michigan 48061-5003

Mr. Roy Schrameck, District Supervisor Surface Water Quality Division Michigan Department of Environmental Quality 38980 Seven Mile Road Livonia, MI 48152

Dear Mr. Schrameck:

On Wednesday, March 20, 1996 our Wastewater Treatment Plant experienced a power outage due to the winter storm that effected Southeastern Michigan. Consequently, our #1 and #2 lift stations and our effluent well overflowed to the Black River. A summary of each overflow is as follows:

Effluent Well Overflow to Black River
Treated Water

45 Minutes, (11:45 a.m. - 12:30 p.m.)
<54,000 gallons
5.6 pounds of solids

#2 Lift Station Overflow to Black River
Fresh Water
3 hrs 48 Minutes, (2:42 p.m. - 6:30 p.m.)
<2300 gallons
0.2 pounds of solids

#1 Lift Station Overflow to Black River
Process Water
50 Minutes, (6:30 p.m. - 7:20 p.m.)
<500 gallons
Proper sample not taken during rush to divert flow.

Process Water to Storm Sewer to Black River
Overflow of Sludge Blend Tank
Minimal Time
<50 gallons
Unable to take sample.

During the severe winter storm that was occurring, ice built up on an exterior electrical conduit at the waste water treatment plant. Water ran down the conduit and into an electrical cabinet, shorting out the buss bars on the switchgear supplying power to part of the waste treatment plant. Partial power was lost which rendered the effluent pumps inoperable. This occurred at 11:45 a.m.

The treatment plant operator immediately tried to restart the pumps and then called supervision who began to shut down the paper machines. The operator then diverted all mill flow to the Neutralization/Equalization Tank. The paper mill was completely shut down by noon, and Blue Water Fiber was also ordered to shut down. All incoming water feeds to the mill were shut down. The situation was investigated and it was determined that power needed to be isolated to fix the problem. The two lift stations were pumped to the lowest levels possible before power was disconnected to the waste treatment plant. A generator was ordered as a backup in the event power could not be restored. Repairs were made and full power was restored at 8:45 p.m..

During the downtime, we were unable to stop all the fresh water from leaving the mill. Personnel were reassigned to track leaks in the mill, and two pumps were ordered to pump out the lift stations. Because of the storm, the smaller of the two pumps arrived first. This pump reduced the amount of overflow from #2 Lift Station by pumping the flow to the City of Port Huron sanitary sewer system. Once the larger pump arrived, the smaller pump was brought to the #1 Lift Station and that flow was diverted also.

The computer control system was inoperable at the beginning of the power outage until small generators were brought in. Once power was restored we noticed that the Sludge Blend Tank level was high and a small amount had overflowed onto the ground. Dewatering of the spill occurred and a small amount of untreated water entered the Black River via a storm sewer.

Power was restored to the waste treatment plant at 8:45 p.m. and the WWTP was in full automatic operation by 9:00 p.m. The paper mill was allowed to begin sending limited quantities of water to the treatment plant at 9:45 p.m. and the paper machines began an orderly start up at 10:00 pm.

The short term corrective actions included fixing the switch, sealing the electrical enclosure, and erecting a temporary shanty. In order to prevent this problem from occurring in the future we will be protecting the switchgear from the weather by moving it inside the treatment plant building. This solution will be implemented before the end of the year.

Please feel free to contact me concerning this matter.

istine J. Lupu

Sincerely.

Christine J. Laipu **Environmental Engineer** 

A. R. Wagner cc:

> S. J. Bentley D. A. Glass

C. R. Cook

J. Fein

### Attachment O Air Permit March 30, 1977

Stevens T. Mason Building, Lansing, Michigan 48926

Air Pollution Control

		~^	TUE	A 1 D	POLLUTION	CONTROL	COULTCION
	IC T I HOM	163	ınc	AIR	ICLLUIION	CONTROL	COMMISSIOR
A 1	LAIVI		—	• -			

for authority to construct, install or alter

MAR 3 U 1977

for permit to operate process, fuel burning, refuse	ourning and/or air pollu	tion control equipment
1. PERMIT TO BE ISSUED TO: (Business License Name of Corporation, Parsn.	ership, Individual Owner, Gove	rnmenial Agency)
2. MAILING ADDRESS: (Number, Street, City or Village, Zip Code)		
	Long	
2000 Facond Avenue Catroit, Hichiga	s <del>n 48226</del>	
3. EQUIPMENT OR PROCESS LOCATION: (Number, Street, City or Village, To	waship, Lip Code)	
1708 Washington Avenue Port Huron, Hic	<del>higan</del>	
4. TYPE OF ORGANIZATION: Corporation Partnersh	ip   Individual	Owner Governmental Agency
S. GENERAL NATURE OF BUSINESS:		
Electric Utility		
6. EQUIPMENT DESCRIPTION: Application is hereby made for permission	to construct, install or alte	er and to operate the following equipment
Wahloo SO ₃ flue gas conditioning sys	tem for Ho. 5 Boll	er - '
Port Huron Plant. (See Attachment A		·
	•	
		,
	•	+
7. ESTIMATED COST: Air Pollution Control Equipment \$	Total Proje	=1 \$ 300,000
PRESENT STATUS OF FOURDARY. (Check and complete the size of the si		344 444
4. PRESENT STATUS OF EQUIPMENT: (Check and complete applicable ite.	Estimoted	Estimated
	Starting Date	Completion Date
( ) Construction or installation not started	11ay 1977	-August-1977
( ) Construction or installation partly completed ( ) Construction completed		
( ) Equipment is to be altered		
( ) Equipment is partly altered		
( ) Equipment has been altered		
( ) Change of location and/or awnership		
3. HAME OF PRIOR OWNER AS IN (1) ABOVE, AND PRIOR AIR POLLUTION CO		
	TROL PERMIT HUMBER, IF	ANY:
(Name)		ANY: it Number)
	(Permi	
(Nems)  10. TYPE OR PRINT HAME AND TITLE OF OWNER OR AUTHORIZED MEMBER OF (Nams)	(Permi	
10. TYPE OR PRINT HAME AND TITLE OF OWNER OR AUTHORIZED MEMBER O	(Permi	
10. TYPE OR PRINT NAME AND TITLE OF OWNER OR AUTHORIZED MEMBER O	(Permi F FIRM: (Title)	t Number)
10. TYPE OR PRINT NAME AND TITLE OF OWNER OR AUTHORIZED MEMBER O	(Permi F FIRM: (Title)	t Number)
(Name) (Signature)	(Permi F FIRM: (Title)	t Number)

अख्याक्षरत ल एक ३५७५,३ इवराप गलात

Detroit Edison Co. Detroit, Michigan



AUG 0 3 1977

#### GENERAL CONDITIONS

- Applicant shall demonstrate compliance with all Commission rules and with all specific conditions of this permit prior to issuance of the Permit to Operate.
- 2. The restrictions and conditions of this Permit to Install shall apply to any person or legal entity which now or shall hereafter own or operate the facilities for which this Permit to Install is issued. The Applicant shall immediately notify the Commission of such change in ownership or principal operator status of this facility.
- 3. Act No. 53 Applicant shall notify any public utility of any excavation, tunceling and discharging of explosives or demolition of buildings which may affect said utility's facilities in accordance with Act No. 53 of the Public Acts of 1974, being Sections 460.701 to 460.718 of the Michigan Compiled Laws and comply with each of the requirements of that Act.
- 4. Rule 21(4) Trial operation of the equipment is permitted until the Commission acts upon the Permit to Operate.
- 5. Rule 29(2) Not more than 30 days after completion of the installation, the Applicant shall apply, in writing, to the Commission for a Permit to Operate. Completion of the installation is deemed to occur not later than commencement of a trial operation pursuant to Rule 21(4). Written application should be sent to: Chief, Permit Unit, Air Quality Division, Department of Natural Resources, P.O. Box 30028, Lansing, Michigan 48909.
- 6. Rule 29(3b) Operation of this facility shall not interfere with the attainment or maintenance of the air quality standard for any air contaminant.
- Rule 29(3d) Operation of this facility shall not result in substantial deterioration of air quality.
- 8. Rule 46 Operation of this facility shall not result in the emission of an air contaminant which causes or will cause detriment to the safety, health, welfare or comfort of any person or which causes or will cause damage to property or business.
- 9. Rule 21 Applicant shall not reconstruct, alter, modify, expand or relocate this facility unless plans, specifications and an application for a Permit to Install are submitted to and approved by the Commission.
- 10. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 11. Notification of any malfunction of process or control equipment resulting in emissions in violation of the Commission rules or of any permit conditions should be made to the District Engineer. Such notice should be made as soon as possible but not later than 9:00 A.M. of the next working day. The notice shall include a program of corrective action and shall be confirmed in writing.

Detroit Edison Co. Permit #106-77 Page 2

#### SPECIAL CONDITIONS

- 12. Rule 44 The particulate emission rate from the 150,000 pounds of steam per hour pulverized coal firing boiler shall not exceed 0.28 pounds per 1,000 pounds of exhaust gases, corrected to 50% excess air.
- 13. Visible emissions are limited to an opacity of less than or equal to 20% except as specified in Rule 336.41.
- 14. Prior to July 1, 1978, sulfur dioxide emissions shall not exceed 3.2 pounds per million BTU's of heat input. This is equivalent to using coal with a 2.0% sulfur content and a heat value of 12,000 BTU's per pound.
- 15. On and after July 1, 1978, sulfur dioxide emissions shall not exceed 2.4 pounds per million BTU's of heat input. This is equivalent to using coal with a 1.5% sulfur content and a heat value of 12,000 BTU's per pound.
- 16. Rules 51, 52 & 54 Verification of particulate emission rates by testing, at owner's expense, in accordance with Commission requirements may be required for operating approval. If a test is required, stack testing procedures and the location of stack testing ports must be approved, in writing, by the Commission or its authorized representative.

GLA: jv

F(30 #5

#### SUPPLEMENT TO PERMIT No. 106-77

#### The Detroit Edison Company Detroit, Michigan

AUG 17 1979

#### GENERAL CONDITIONS

- 1. Approval of the Permit to Operate will remain in effect as long as compliance with Commission rules and with specific conditions of this permit is maintained.
- 2. The restrictions and conditions of this Permit to Operate shall apply to any person or legal entity which now or shall hereafter own or operate the facilities for which this Permit to Operate is issued. The Applicant shall immediately notify the Commission of such change in ownership or principal operator status of this facility.
- 3. Rule 29(3b) - Operation of this facility shall not interfere with the attainment or maintenance of the air quality standard for any air contaminant.
- 4. Rule 29(3d) - Operation of this facility shall not result in substantial deterioration of air quality.
- 5. Rule 46 - Operation of this facility shall not result in the emission of an air contaminant which causes or will cause detriment to the safety, health, welfare or comfort of any person or which causes or will cause damage to property or business.
- 6. Rule 21 - Applicant shall not reconstruct, alter, modify, expand or relocate this facility unless plans, specifications and an application for a Permit to Install are submitted to and approved by the Commission.
- 7. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 8. Notification of any malfunction of process or control equipment resulting in emissions in violation of the Commission Rules or of any permit conditions should be made to the District Engineer. Such notice should be made as soon as possible but not later than 9:00 A.M. of the next working day. The notice shall include a program of corrective action and shall be confirmed in writing.

#### SPECIAL CONDITIONS

- Rule 44 The particulate emission rate from the 150,000 pounds of steam per hour pulverized coal firing boiler shall not exceed .28 pounds per 1,000 pounds of exhaust gases, corrected to 50% excess air.
- 10. Visible emissions are limited to an opacity of less than or equal to 20% except as specified in Rule 336.41.
- Sulfur dioxide emissions shall not exceed 2.4 pounds per million BTUs of heat input. This is equivalent to using ox with a 1.5% sulfur content and a heat value of 12,000 BTUs per pound. Servet baye

BEG:mb

# STATE OF MICHIGAN TRANSMITTAL

TO:	NAME	TO:	NAME
1. Jim Gess	ner, The Detroit	Edison (	Company
2. Tom Maki	District Engine	et, Air	Quality Division
3.		7.	
4.	÷	8.	•
FOR ACTION AS II			
SIGNATURE	REPLY-MY SIGNATURE		NOTE AND FORWARD
APPROVAL	REPLY-COPY TO A	۸E	M NOTE AND FILE
_ ACTION	PLEASE SUMMARI	ZE	☐ NOTE AND RETURN
□ COMMENTS	PLEASE INVESTIGATE		PLEASE PHONE ME
M INFORMATION	FORWARDED PER REQUEST		PLEASE SEE ME
REMARKS:	mit No. 106-77	+ ** # ·	

Please note Special Condition no. 11 has been corrected to read "coal" instead of oil.

FROM	.7.	<i>]</i> .	DATE 9-6-79
	Mary	Laner	7-6-11
	. : * * / .		

FORM 10580 - 11

# Attachment P

# Follow-up Correspondence



# E. B. EDDY PAPER, INC.

Phone: (810) 982-0191 Fax: (810) 982-7124 1700 Washington Ave P.O. Sox 5003 Port Huron, Michigan 48061-5003

September 10, 1996

State Emergency Response Commission Michigan Department of State Police Emergency Management Division 300 S. Washington Square Lansing MI 48909

RE: EPA Community Right-to-Know Notification Rule

Under the Emergency Planning section of the Community Right-To-Know Rule, each facility where any extremely hazardous substance is present at any one time in excess of its threshold planning quantity, must notify the emergency response commission for the state in which the facility is located. In addition, a facility emergency coordinator must be designated.

This letter is to inform you of an emergency coordinator update.

Our emergency coordinator is

Kenneth Wood, Maintenance Manager

Work Address:

1700 Washington Ave., Port Huron MI 48060 work (810) 984-9538, pager (810) 406-2628

We are currently working with the St. Clair County LEPC to update the response plan that was originally developed by the Port Huron Fire Department.

If you have any questions, please feel free to contact me at 810-982-0191.

Sincerely,

Christine J. Lupu

Environmental Engineer

cc: St. Clair County LEPC

# Attachment Q

Preamble to E.B. Eddy Paper, Inc, Response to U.S. EPA's CERCLA Section 104 (e)

Request for Information



# E. B. EDDY PAPER, INC.

Phone: (810) 982-0191 Fax: (810) 982-7124 1700 Washington Ave. P.O. Box 5003 Port Huron, Michigan 48061-5003

#### CERTIFICATION OF CERCLA SECTION 104(E) RESPONSES

E. B. Eddy Paper, Inc. declares and certifies that the information provided in its response to this Information Request is true, accurate and complete.

Respectfully submitted, E. B. Eddy Paper, Inc.

Howard L. Hunter Technical Director

Dated: 1 December 95

MARRYN J. PUNLEY
NOTATY PUBLIC - ST. DLAIR COUNTY, MA
MY COMMASSION EXPIRES 12/20/06

# Preamble to E.B. Eddy Paper, Inc. response to U.S. EPA's CERCLA Section 104(e) Request for Information

E. B. Eddy Paper, Inc. ("E. B. Eddy") responds to U. S. EPA's CERCLA Section 104(e) Request for Information pursuant to its obligations under CERCLA. However, as will be explained more fully below (and explained in specific Information Request responses), on September 5, 1995, E. B. Eddy was not in possession, control, or responsible for the installation, operation or maintenance of the anhydrous ammonia or the storage tank system which is the subject of the information requests.

The facility in question is a pulp manufacturing plant owned by Blue Water Fiber Limited Partnership ("Blue Water Fiber"). E. b. Eddy, and Rust Engineering ("Rust") are each 50% partners in Blue Water Fiber. The waste treatment facility is located on E. B. Eddy-owned property, but is leased to Blue Water Fiber.

Blue Water Fiber manufactures paper pulp from recycled office waste paper for sale as market post-consumer recycled pulp. Under a March 1, 1994 Services Agreement between Blue Water Fiber and E. B. Eddy, Blue Water Fiber constructed a wastewater treatment plant to accommodate wastewater effluent from Blue Water Fiber's pulp production facility. The anhydrous ammonia stored at the wastewater treatment facility is consumed in the waste water treatment plant as vapor ammonia, as a nutrient in the treatment process.

As of September 5, 1995, and during the months prior to that date, the construction of the wastewater treatment plant and the installation of the ammonia storage tank was considered "start up", or in a pre-mechanical completion status. E. B. Eddy acquired the responsibility for maintenance and operation of the tank once the entire facility was deemed mechanically complete.

On September 5, 1995, because that date was prior to mechanical completion, the installation and maintenance duties were handled by Rust, and its subcontractor, Stanley Jones Company. Stanley Jones arranged for the installation of the tank and the separate vaporizer loop heating assembly. Stanley Jones arranged for the tank's placement on pilings, and connected the vaporizer loop assembly to the tank. Again, E.B. Eddy had no involvement in the installation of the tank/heater assembly.

As a result, on September 5, 1995, when the very minor ammonia release occurred, E. B. Eddy had neither the authority nor the control to address the incident. The incident was addressed, contained and satisfactorily resolved by Rust and Stanley Jones.

Question 14: How much of each hazardous substance was released? Describe your method or source of information in calculating the quantity released and provide the calculations.

14. The worst case scenario is that 17.28 pounds of vapor ammonia were released on September 5, 1995. The ammonia that was released was the amount contained in the vaporizer loop and the worst case calculations assume that the entire vaporizer loop volume was filled with liquid anhydrous ammonia, which was not the case.

Heater: Each Tube = 5 feet Number of tubes = 2 Diameter = 2 inches
$$\frac{\P^*(d)2}{4} = \frac{(3.14)(2)2}{4} = 3.14 \text{ in } 2 \times 1612/144 \text{ in } 2 = .02 \text{ ft } 2$$

$$.02612 \times 10 \text{ feet} \times 7.48 \text{ gal}/63 \times 5.04 \text{ lbs/gal} = 7.54 \text{ pounds}$$

Line from: Piping length = 22 inches = 1.83 feet Diameter = 1 1/2 inch tank to heater  $\frac{\P^*(d)2}{\sqrt{1-2}} = \frac{(3.14)(1.5)2}{\sqrt{1-2}} = 1.77 \text{ in } 2 \times 1612/144 \text{ in } 2 = .01 \text{ ft } 2$ 

.01 ft2 x 1.83 feet x 7.48 gal/ft3 x 5.04 lbs/gal = 69 pounds

Line from: Piping length = 12 feet Diameter = 2 inches

heater to top of tank  $\P'(d)2 = (3.14)(2)2 = 3.14 \text{ in } 2 \times 162/144 \text{ in } 2 = .02 \text{ ft } 2$ 

4

(Should not be filled with .02ft2 x 12 feet x 7.48 gal/ft3 x 5.04 lbs/gal = 9.05 pounds

Therefore worst case equals: 7.54 + .69 + 9.05 = 17.28 pounds

liquid)

It would be realistically expected that the pipe would contain liquid ammonia filled to a height equal to a height of that of the level in the tank. Therefore, a more realistic calculation of the estimated release would be 12.75 pounds.

Number of tubes = 2 Heater: Each Tube = 5 feet Diameter = 2 inches

 $3.14 \text{ in } 2 \times 1 \text{ ft2/144in } 2 = .02 \text{ ft2}$ 

.02ft2 x 10 feet x 7.48 gal/ft3 x 5.04 lbs/gal

7.54 pounds

Line from: Piping length = 22 inches =1.83 feet Diameter = 1 1/2 inch

tank to

heater

$$\frac{1}{(d)^2} = \frac{(3.14)(1.5)^2}{1} = 1.77 \text{ in } 2 \times \frac{1112}{144 \text{ in } 2} = .01 \text{ ft } 2$$

.01 ft2 x 1.83 feet x 7.48 gal/ft3 x 5.04 lbs/gal

69 pounds

Line from: Piping length = 6 feet

heater to

Diameter = 2 inches

 $3.14 \text{ in } 2 \times 1 \text{ ft2/144 in } 2 = .02 \text{ ft2}$ 

.02ft2 x 6 feet x 7.48 gal/ft3 x 5.04 lbs/gal

4.52 pounds

Therefore worst case equals:

7.54 + .69 + 4.52

12.75 pounds

# E. B. EDDY PAPER, INC. Port Huron, Michigan

Fax Transmission: 7 Pages, Including This Cover

To: Raghu Nagam

Fax No: (312) 578 9345

From: Chris Lupu

Fax No: (810)

(810) 982 3223

Date: 9-23-96

Time: 11:15 am

If this transmission is not clear or incomplete, phone (810) 982-0191 ext 252 and ask for Jim Z

#### Comments:

#### Raghu,

I am following up with the information you had requested. Attached you will find 4 pages dealing with the Ammonia response, 1 page containing letter to SERC dealing with emergency coordinator status, and 1 page stating the August 30th opacity readings after review of the strip chart. In addition, you had asked for information on the boilers. It is as follows:

#2 Boiler

69 x 106 BTU/HR

**Built 1960** 

Installed here in 1966

#4 Boiler

91 x 10⁶ BTU/HR

Built 1937

#5 Boiler

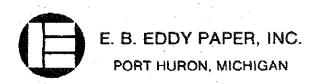
196 x 106 BTU/HR

**Built 1968** 

Please feel free to contact me if you have any further questions.

#### Chris Lupu





#### MEMORANDUM

DATE:

September 20, 1996

TO:

Chris Lupu

FROM:

Randy McNeely Rame_

SUBJECT:

Opacity

COPY TO:

Upon examination of the continuous strip chart, it was determined that the opacity at #5 Boiler stack was 0% during the entire time period of 10:00 am until 12:00 noon on August 30, 1996.

# Exhibit A

# **Notice of Inspection**

# The Park of the Pa

#### NOTICE OF DEPRETICE

United States Environmental Protection Agency
Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) a
Comprehensive Environmental Response, Compensation and Liability Act (C

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
5 30 96	INSPECTOR NO.	DAILY SEQ. NO.	10:40	E.B EDDY PAPER, INC
4. INSPECTOR ADDRESS United States Environmental Protection Agency Region 5 77 West Jackson Boulevard Chicago, Illinois 60604				5. FIRM ADDRESS  1700 WASHINGTON AVE PORT BOX 500 3  PORT HURON, MI 48061-5003

REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986 and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including wasta handling and treatment operations; taking samples and photographs; and any other inspectic activities necessary to determine compliance with the Act.

Raghu Nagam.		Christine J. Lupu		
RAGHU WAGAM		Christine J. Lupu		
START - ELE	<b>S</b>  30  96	Environmental Engineer 330/96		

## Exhibit B

# **Receipt for Samples and Documents**



# United States Environmental Protection Agency

Region 5 Emergency Planning and Community Right-to-Know Act of 1986 (ER SARA TITLE III
RECEIPT FOR EMPLES AND DOCUMENTS

		1000000	Grade No &		
1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM HAME	
DATE 8 30 196	INSPECTOR NO.	DAILY SEQ. NO	15:20	E.B. EDDY PAPER, INC	
77 W Chic The documents are the administration	Environmental Pr Region 5 est Jackson Boule ago, Illinois 60 d samples of dramical on and enforcement of	vard 604 substances and/or n the Rhangency Plan	mixtures described nine and Community	5. FIRM ADDRESS 1700 WASHINGTON AVE P.O. BOA SOO3 PORT HURON, M.P. 48061-51 (810) 98 2 - 0191  below were collected in correction Right-to-Know Act of 1986.	
	PT OF THE DOCUMEN	T(S) AND/OR SAM	777 7 9	D IS HEREBY ACKNOWLEDGED:	
No.	601	4.5 CH5 W/A	Description		
(1) List of CHEMICALS (1) 1995 TIER II, 1st PAGE OF 1994 (1993 TIER II FORM (3) WASTE MANIFESTS OF 7/15/96 (2 7/24/96) (4) PROCESS MAP (5) MICHIGAN AIR POLLUTION REPORT - 1995 (6) AUGUST 196 PRECIPITATOR LOY (7) SULFUR SAMPLE RESULTS 5/1-5/7/96, 5/8 - 5/21/96, 5/22 - 5/24/96 (8) TULY VOL REPORT FOR PLANT # 8 (9) SUMMARY REPORT APPLY - TUNE 9/6: BOILEDLESS - CPACITY (10) RELEASE NOTIFICATION FROM WASTEWATER THEATMENT PLANT: 3/22/94 (11) NPDES DISCHARGE MONITORING REQUIREMENT - 9/27/96 (12) 1) 2) (13) NPDES DISCHARGE MONITORING REQUIREMENTS - UPDATE TUNE - JULY 1996 (15) NPDES DISCHARGE MONITORING REQUIREMENTS - UPDATE TUNE - JULY 1996 (16) APPLIES FOR UTDETLING I ITEMS HAVE ITEM Claimed as trade 3-THE. The facility official requesting such treatment has read and understands ETCHA Section and pertinent trade secret regulations and understands ETCHA Section (16) APPLICATION PAPOLITIES FOR Frivalus Claims. (15) APPLICATION TO MAPICH 30, 1947					
Optional: Duplicate or	split samples:	Requested and P	rovided [	Not Requested ! !	
INSPECTOR SI	ghu Nagam.		Christine	Fupn	
START		DATE SIGNED 8 30 94	Environmental	DATE SIG	

## Exhibit C

# Photo documentation



Site: E.B. Eddy Paper Company Location: Port Huron, Michigan TDD: S05-9603-025 Date: 08/30/96 Time: 1115 Hrs Photographer: R. Nagam

Description: View of the chemical storage area and the boiler area

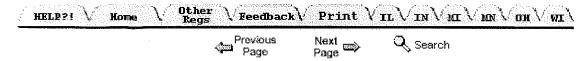


Site: E.B. Eddy Paper Company Location: Port Huron, Michigan

TDD: S05-9603-025 Date: 08/30/96 Time: 1115 Hrs Photographer: R. Nagam Description: View of the stack connected to coal boiler and equipped with elector static precipitator



# State Implementation Plans



# State of Michigan

Main Heading: Part 4. Emission Limitations and Prohibitions - Sulfur-bearing compounds	
Subheading: R336.1402 Emission of sulfur dioxide from fuel-burning sources other than	
power plants	
Item Subpart: R336.1402	

### **▶** Citations & Dates

Regulatory Text:

Rule 402. (1) Except as provided in rule 401 and subrule (2), after January 1, 1981, it is unlawf for a person to cause or allow the emission of sulfur dioxide from the combustion of any coal o oil fuel in excess of 1.7 pounds per million Btu's of heat input for oil fuel or in excess of 2.4 pounds per million Btu's of heat input for coal fuel.

(2) The provisions of this rule do not apply to a fuel-burning source that is unable to comply we the specified emission limits because of sulfur dioxide emissions caused by the presence of sulfur other raw materials charged to the fuel-burning source. This exception shall apply if at any to the actual sulfur dioxide emission rate exceeds the expected theoretical sulfur dioxide emission rate from fuel burning. The expected theoretical sulfur dioxide emission rate shall be based on quantity of fuel burned and the average sulfur content of the fuel.

AIR AND RADIATION DIVISION 77 WEST JACKSON BOULEVARD (A-18J) CHICAGO, ILLINOIS 60604

(800) 621-8431 on (312) 353-2212

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